

JUN 28 1985

ALEXANDER L. STEVENS,
CLERK

No. 84-1340

In The
Supreme Court of the United States
October Term, 1984

— 0 —
WENDY WYGANT, SUSAN LAMM,
JOHN KRENKEL, KAREN SMITH,
SUSAN DIEBOLD, DEBORAH BREZEZINSKI,
CHERYL ZASKI and MARY ODELL,
Petitioners,

v.

JACKSON BOARD OF EDUCATION,
Jackson, Michigan, and RICHARD SURBROOK,
President; and DON PENSON, ROBERT MOLES,
MELVIN HARRIS, CECELIA FIERY,
SADIE BARHAM, and ROBERT F. COLE,
Respondents.

— 0 —
**ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

— 0 —
JOINT APPENDIX
— 0 —

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Petition for Certiorari Filed February 21, 1985
Certioari Granted April 15, 1985

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DOCKET JOURNAL ENTRIES (E.D. Mich.)

Date	NR.	Proceedings	81-6016
Sep. 4	1.	Complaint filed, summons issued.	DD9/8/81
	14	2. Appearance of attorney Jerome A. Susskind for defendants and Proof of Service	DD9/14/81
	21	3. Deft's Acknowledgement and acceptance of service and notice of appearance	DD9/22/81
Oct 13	4.	Defts' MOTION for Summary Judgment, BA and notice of hearing set for 12/14/81 at 9:30 A.M. and PS	DD10/14/81
Dec 14	5.	MOTION for Summary Judgment and other relief by Pltfs., BA, Aff. of Service and NOTICE OF HEARING set for 12/14/81 at 9:30 AM.	DD12/14/81
Dec 14	6.	Aff. of service re Motion for Summary Judgment	DD12/14/81
	14	7. CROSS MOTIONS for Summary Judgment heard and taken under advisement THORNTON	
	29	8. ORDER of Reassignment to Ann Arbor Administrative Unit, FEIKENS	DD1/4/82
Feb 9	9.	Pltfs' NOTICE OF HEARING on Motion for Summary Judgment filed 12/14/82 reset for hearing before Hon. Charles W. Joiner for 2/23/82 at 2:30 PM, PS	DD2/20/82
	23	— CROSS MOTIONS for Summary Judgment heard/TAKEN UNDER ADVISEMENT by Judge Joiner	

Mar 8 10. LETTER dtd 3/3/82 re: Past decisions and how they reflect on current case before the court. DD3/9/82

10 11. Aff of Susan Diebold re: Minority Teachers with Seniority with Aff. DD3/11/82

Jun 14 12. Aff. of Thomas Rasmusson re: Interpretation of seniority list. DD6/15/82

Aug 13 13. Aff. of Jane I. Phelps re: review of records on hiring of new teachers and PS. DD8/14/82

Sep 7 14. Memorandum Opinion and Order and Proof of Mailing DD9/9/82

7 15. JUDGMENT: Granting Defendants 1 through 8 MOTION for Summary Judgment and denying Plaintiffs 1 through 19 Motion for Summary Judgment re: Equal Protection, Section 1981, 1983 and 1985 claims be dismissed on the merits with prejudice and that the remaining claims be dismissed without prejudice. DD9/9/82

9 16. AMENDED JUDGMENT: same as above except reflecting the name of plaintiffs and defendants. DD9/9/82

Oct 6 17 NOTICE OF APPEAL filed, fee paid (receipt A0193). DD10/7/82

7 — LETTER re appellate procedure information sheet, Transcript Order Form, receipt for fee mailed to Appellant's Counsel.

1982

Oct 7 — LETTER Re: Designation mailed to Pltf's Counsel Warren and Deft's Counsel Thomas, with copies of docket to each. DD10/7/82

7 18. Clerk's PS of mailing NOTICE of Appeal. DD10/7/82

7 — Transmission Form to Court of Appeals w/attachments: copy of docket and pleadings #14, 15 and 16. DD10/7/82

14 — Transcript ordered this date, no deposit received. SLA

19 19. Ack. from CCA, File No. 82-1746 assigned. DD10/20/82

22 20. Defts' Designation of record. DD10/22/82

25 21. Deposit received, Transcript ordered, est. completion 11/30/82. DD10/25/82

Nov 2 22 Pltf's Motion to withdraw or strike name of R.D. Burnette from Notice of Appeal, PS. DD11/3/82

2 23 LETTER dtd 11/2/82 to Pltf's counsel from K. Kircher, advising this Court cannot act on Motion to withdraw name since CCA has already received and docketed appeal, suggests same motion be submitted to CCA. DD11/3/82

8 24 Pltf's DESIGNATION of the Record. DD11/10/82

17 25 LETTER dtd 11/10/82 from
Pltf's counsel withdrawing
Motion to Strike Name
(See #23 for further in-
formation). DD11/17/82

Dec 29 26. EXTENSION of time to file
transcript granted to 12/31/82. LDD1/3/83

1983

Mar 17 27. TRANSCRIPT of proceed-
ings held 2/23/83. LDD3/17/83

Apr 8 28. Transmission of Designated
Record to CCA SDD4/8/83

May 11 29. Ack. from CCA of receipt of
Designated Record on 4/15/83 SDD5/11/83

1984

Oct 29 30. INFORMATION Copy from
CCA—affirming the district
court decision. TDD10/29/84

Nov 20 31. JUDGMENT of the said district
court is hereby affirmed.
ISSUED AS MANDATE: 11/16/84
COSTS: None (file returned).
TDD11/20/84

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Civil Action No. 81-60156

WENDY WYGANT, et al.,

Plaintiffs,

v.

JACKSON BOARD OF EDUCATION, et al.,

Defendants.

HON. CHARLES W. JOINER

JUDGMENT

Cross-motions for summary judgment were filed and heard by the court, the Honorable Charles W. Joiner presiding, and the issues were resolved in a Memorandum Opinion and Order dated September 7, 1982.

It is Ordered and Adjudged that the plaintiffs take nothing, and that the Equal Protection, § 1981, § 1983 and § 1985 claims be dismissed on the merits with prejudice, and that the remaining claims be dismissed without prejudice.

ROBERT A. MOSSING
Clerk of the Court

Approved as
to form:
/s/ ewj

/s/ By Sharon M. Bruley
Deputy Clerk

5-4-B

Form A.O. 147 (July 1953)

GENERAL DOCKET
UNITED STATES COURT OF APPEALS
FOR THE
SIXTH CIRCUIT

CASE NO. 82-1746

APPEAL FROM

Eastern District of Michigan, S. D. at Ann Arbor

Wendy Wygant, Leonard Bluhm, Susan Lamm, John
Krenkel, Florence Csage, Karen Smith, Susan Diebold,
Deborah Brzezinski, Kathleen Crecine, Gordon Holton,
Cheryl Zaski, Robert L. Staska, David F. Kiesel, Paula
Janke, Martha Verhoeven, Perry Maynard, Mary O'Dell
and Ruth Ann Anderson,

Plaintiffs-Appellants,

vs.

Jackson Board of Education, Jackson, Michigan, and
Richard Surbrook, President, Don Penson, Robert Moles,
Melvin Harris, Cecelia Fiery, Sadie Barham and Robert
F. Cole,

Defendants-Appellees

Thomas Rasmusson

Joseph A. Warren

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Attorneys for Appellee

(C.R.) Title VII

No. Below: 81-60156

Judge Below: Joiner

Date of Judgment: September 7, 1982

Notice of Appeal Filed: October 6, 1982

Date—10/12/82

Account of Appellant—Fee paid

Received—

Disbursed—

Remarks—Certified Record returned to D.C. 11/16/84

GENERAL DOCKET
UNITED STATES COURT OF APPEALS
FOR THE
SIXTH CIRCUIT

Case No. 82-1746

DATE	FILINGS—PROCEEDINGS	Filed
1982		
10/12	1) Copy of notice of appeal filed; and cause docketed	
10/18	2) Designation of appendix by appellants (m-10/14/82)	
10/19	3) Pre-argument statement filed	
10/27	4) Notice from court reporter that transcript was ordered 10/14 and estimated completion date is 11/30 (50 pages)	
11/17	5) Stipulation by both parties to withdraw the name of Ronald D. Burnette as a party plaintiff-appellant (m-11/10/82)	
11/24	6) Order granting stipulation to withdraw name of Ronald D. Burnette (entered pursuant to Rule 4(f))	
12/27	7) Motion: court reporter to 12/31 to file transcript (m-12/21) (0/0) (Extension to 12/31 granted; JPH/jk 12/27)	
1983		
1/31	8) Letter to court reporter directing notification by 2/4 why transcript has not been filed	
2/10	9) Appearance of T. Rasmusson for appellant	
2/10	10) Appearance of J. A. Susskind for appellee	

3/14	11)	Letter to court reporter directing notification by 3/21 as to what the status is regarding transcript
4/18		<i>Certified Record</i> (1 vol. pleadings w/1 vol. transcript) filed
5/27		Brief (10) of appellants (m-5/27/83)
6/13	12)	Motion: appellees to 7/25/83 for filing brief (m-6/9/83) (Denied Extension to 7/24 granted; JPH/jk 6/14)
6/29		Brief (10) of appellees (m-6/29/83)
7/18		Joint Appendix (5) (m-7/15/83)
1984		
2/3	13)	Additional Citations of plaintiff (m-2/1/84)
2/23		Cause argued by Thomas Rasmusson for appellant; by Jerome A. Susskind for appellee and case submitted to the Court (Before: Edwards, Wellford and Peck, JJ.)
5/11	14)	Additional Citation of appellee
10/25	15)	Judgment of the district court affirmed (Edwards, Wellford and Peck, JJ.) FP
10/25		Opinion by Edwards, J. (Wellford, J., concurring)
11/16	16)	Mandate issued (COSTS NONE)
1985		
03/05	17)	SUPREME COURT NOTICE: petition for cert. filed 2/21/85 (Sp. Ct. No. 84-1340)
04/24	18)	SUPREME COURT ORDER: cert. granted 4/15/85
04/24		SERVICE of certified copy of Supreme Ct. ruling to Dist. Ct.

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

No. 82-1746

WENDY WYGANT, et al.,
Plaintiffs-Appellants,
vs.

JACKSON BOARD OF EDUCATION,
JACKSON, MICHIGAN, et al.,
Defendants-Appellees.

Before: EDWARDS and WELLFORD, Circuit Judges;
and PECK, Senior Circuit Judge.

J U D G M E N T

FILED OCT. 25, 1984

ON APPEAL from the United States District Court
for the Eastern District of Michigan.

THIS CAUSE came on to be heard on the record
from the said District Court and was argued by counsel.

ON CONSIDERATION WHEREOF, It is now here
ordered and adjudged by this court that the judgment of
the said District Court in this case be and the same is
hereby affirmed.

Each party is to bear its own costs on appeal.

ENTERED BY ORDER OF THE COURT

John P. Hehman, Clerk

/s/ John P. Hehman
Clerk

Issued as Mandate: November 16, 1984 A True Copy.
COSTS:NONE

Filing fee\$

Printing\$

Total.....\$

Attest:

Tom
Deputy Clerk

1972-73 TEACHER CONTRACT
(Relevant Provisions)

ARTICLE XII¹

Continuity of Operations

- A. All teachers, who are under contract, shall have a right to expect and demand that the Board will meet their contractual obligations and that any reductions in such staff for the following school year must be affected not less than sixty (60) calendar days prior to the last day of school in the current regular school year.

Supplementary contracts may be offered on a provisional basis that the Board may void the contract at any time for the following reasons:

1. Insufficient student interest in the activity.
2. Lack of funds.
3. Position is abolished. If the position is abolished after the teacher has been on the job, he will be paid on a prorated basis for the time worked.
4. A supplementary contract may be voided by a teacher giving ten (10) school days notice of his intent. Teachers taking such action relinquish any rights to that position for the balance of the school year concerned.

¹ It is stipulated by the parties that the same language of Art. XII in the 1972-73 contract has been carried over intact into all successive labor contracts, to and including the present contract which operates until 1988.

B. Layoff Procedure

1. In the event that it becomes necessary to reduce the number of teachers through layoff from employment by the Board, teachers with the most seniority in the district shall be retained, *except that at no time will there be a greater percentage of minority personnel laid off than the current percentage of minority personnel employed at the time of the layoff.* In no event will the number given notice of possible layoff be greater than the number of positions to be eliminated. Each teacher so affected will be called back in reverse order for positions for which he is certificated *maintaining the above minority balance.* (emphasis added)
2. It is expressly understood that the Board may make a reasonable estimation of the positions to be eliminated based on available financial information at the time of the layoff and that it is within the Board's proper authority to reinstate eliminated positions at its discretion.
3. *Teachers who are on layoff will not accrue seniority in the district.* Seniority is defined as the length of service of a teacher since the acceptance date of his last letter of appointment for hiring. No teacher will be required to accept a position in the middle of a school year. Teachers on layoff will lose their seniority when their layoff time exceeds their seniority at the time of layoff or when they refuse call-back to a position for which they are certificated, whichever is the longer period of time. However, any teacher who refuses

a call-back during summer months shall lose all seniority. (See Letter of Intent - Page 85)

Nothing in this paragraph shall require the recall of a teacher who is not certificated for a vacancy.

4. A teacher being recalled shall have ten (10) days to notify the Board of acceptance of the position. In each case a personal contact will be made wherever possible. A teacher who is unable to be contacted shall be recalled by certified mail, and sent to the teacher's last known address, copy to be sent to the J.E.A. office on the same day. The teacher shall have ten (10) days to notify the Board of acceptance of the position from the date of postmark (stamped) on the certified receipt. The failure of a teacher to notify the Board within ten (10) days of acceptance shall be treated as terminated consistent with B, 3 of this Article. Two days before any teacher is terminated, J.E.A. will be notified of the Board's intent to terminate.

* * *

ARTICLE VII²

Professional Qualifications and Assignments

- A. Teachers shall not be assigned outside the scope of their teaching certificates. Exceptions may be made when agreed to by the teacher and approved by the Professional Council.

² It is stipulated by the parties that the same language of Art. VII in the 1972-73 contract has been carried over intact into all successive labor contracts, to and including the present contract which operates until 1988.

- B. All teachers shall be given written notice of their subjects and/or grade assignments for the forthcoming year no later than the close of the preceding school year. In the event that changes in such assignments are necessary, all teachers affected shall be consulted promptly or notified by registered mail. In the event such change comes within sixty (60) days of the start of the ensuing school year, the teacher may resign from the school district without penalty to his/her tenure status or take advantage of regular transfer procedure as outlined in Article VIII, F.
- C. Any assignments in addition to the normal teaching schedule during the regular school year shall not be obligatory but shall be with the consent of the teacher.
- D.
 1. The Board and the Association, *in recognition of the desirability of multi-ethnic representation on the teaching faculty*, hereby declare a policy actively seeking minority group personnel. For the purposes of this contract, minority group personnel will be defined as those employees who are Black, American Indian, Oriental, or of Spanish descendancy. *The goal of such policy shall be to have at least the same percentage of minority racial representation on each individual staff as is represented by the student population of the Jackson Public Schools. (emphasis added)*
 2. In order that this goal be expeditiously met, it is agreed that, *for vacancies in school buildings in which this goal has not been met, the Board will actively seek, recruit, and hire qualified minority teachers for such vacancies.* The Board

will annually review each individual staff to ensure proper minority representation. Such report will be presented to the Association through the Professional Council. (See Letter of Intent - Page 102)

3. *It is understood that deviation beyond acceptable racial balance standards as hereinafter defined may initiate action by the Board in accordance with Article VIII, E, 2 to correct the racial balance of particular school staffs. "Acceptable racial balance standards" shall mean that the staff of a building shall not exceed a percentage of minority staff which is greater than double the overall percentage of minority teachers in the bargaining unit or be less than one-half (1/2) of that same percentage (by three (3) categories: elementary, middle school and high school). (Emphasis added)*
- E. A refusal to teach any child or children based upon race, creed, or ethnic origin, at any school to which a teacher may be assigned shall be judged as insubordination.
- F. The Board and the Association recognize that the ability of pupils to progress and mature academically is a combined result of school, home, economic and social environment and that teachers alone cannot be held accountable for all aspects of the academic achievement of the pupil in the classroom. Test results of academic progress of students shall not be used in any way as evaluative of the quality of a teacher's service or fitness for retention.

ARTICLE VIII

Vacancies, Promotions and Transfers

Definition of Vacancy

- A. A vacancy in a building/grouping exists and will be posted for bids when:
 1. a new classification or job is created;
 2. a teacher retires, dies, or quits;
 3. a teacher is discharged for just cause;
 4. a teacher fills a vacancy in another building/grouping;
 5. a teacher is granted a leave of absence exceeding one year;
 6. all displaced teachers who have been displaced from the building during the period of the last year have been offered a chance to return to the building, provided they are qualified and certified to fill the position(s) which become available.

It is understood that internal building transfer may take place prior to the determination of the specific vacancy to be posted.

- B. Whenever vacancies occur during the normal summer vacation months in addition to the normal posting as described in Section C, the following procedure will be followed:
 1. Teachers with specific interests in possible vacancies will notify the Personnel Office of their

interest in writing during the last week of school and shall include an address where they can be contacted during the summer. The Personnel Office will maintain a list of the teachers and their preferences for the summer vacation period.

2. Should a vacancy occur, the teachers who have expressed a preference for that vacancy will be notified and the principal of the building concerned will receive a list of the teachers who have indicated their interest.
 3. At a teacher's written request during the last week of school, the Personnel Office will mail to him/her all Professional Vacancy Notices which are posted between the last day of school and Labor Day.
- C. Any vacancy occurring within the first 12 working days from the start of school shall be posted. It is understood that vacancies that are created as a result of unexpected increase in enrollment above projected enrollments will be posted within the first 12 working days after the start of school. A short posting period at this time of three (3) working days is permissible. Any vacancy occurring after 12 working days from the opening of school may be filled on a temporary basis by an applicant who either has a Michigan Provisional or Permanent Certificate, or Continuing Certificate, or who can be fully qualified for such within ninety (90) days after employment. Exceptions to the foregoing will be made in the case of teachers in the vocational training program who meet Michigan certification requirements. *In accordance*

with Article VII, paragraph D, every reasonable effort will be made to fill such vacancy with a member of a minority racial group until the provisions of Article VII, D have been fulfilled. In the event that there is no certified minority applicant available, the position may be filled by any certified applicant. In the event such teacher does not fulfill these requirements during the time period set forth, the teacher's appointment may be voided and the teacher will be placed on layoff status.

- D. 1. Whenever a vacancy in any professional position in the district shall occur and where the provisions of Article VII, paragraph D, have not been met, and is indicated by official notification, the Board will give written notice of the same to the Association within seven (7) days and will post such vacancies simultaneously in each school building.

In accordance with Article VII, paragraph D, a moratorium on transfers within the district will be in effect for a period of four (4) weeks. During such four (4) weeks all reasonable efforts will be made to fill the position with a minority applicant holding either Michigan Provisional or Permanent Certificate, or Continuing Certificate, in the field of the vacancy or an applicant who can qualify for such certification within ninety (90) days. In the event the vacancy is not filled with a certificated minority racial group member within four (4) weeks of such posting, the transfer and hiring procedures of this Article and

others that are applicable shall apply. (Emphasis added).

2. The Board will support a policy of filling vacancies within the bargaining unit from within its own staff. Vacancies shall be filled based on the teaching experience in the area of assignment, the teacher's major field of specialization, and length of service in the district. In the case of high school/middle school counseling the Board may require applicants for a counseling position who do not at the time of the application hold or have held a counseling position in the district to complete an appropriate test or tests. Such test(s) shall have the approval of the Professional Council with input from current counselors.
 - a. An applicant accepting a teaching assignment in a building shall be required to follow the designated educational program in that building which other teachers in the building follow. Willingness to accept such a position shall be sufficient to fulfill the preceding requirement. No efforts by any administrator shall be made to discourage a teacher from seeking or accepting a transfer because of this requirement.
 - b. An applicant with less service in the district shall not be awarded such a position unless his qualifications shall be substantially superior, *except that less senior minority teachers may be appointed to such vacancies over majority teachers until such time as the*

goals of Article VII, D are reached. (Emphasis added).

Vacancies in senior high school head basketball and head football may be posted in connection with a teaching assignment currently filled by a teacher within the building (i.e., head football-mathematics) after the head coaching position vacancy has been posted within the building in which the vacancy occurs and after posting without recourse to dual posting within and outside of the school district. (See Letter of Understanding—Page 103)

The selection of an applicant in such a duly-posted position will be based upon his/her proficiency in the posted assignment. If a teacher decides to resign from the extra-curricular assignment, or the dual posting of the position is dissolved, the teacher holding such a dual posting shall be considered to be a displaced teacher. (See Letter of Intent—Page 103)

2. In the event a vacancy arises in the administrative or supervisory positions, any qualified teacher may apply. A letter will be sent to each applicant informing him/her of the decision made after it is confirmed by the Board. The Board will give all due consideration to qualified applicants from within the district.

E. Transfers

1. Initiated by the Teacher

- a. The teacher should notify his/her present principal or supervisor that a transfer is being initiated.
- b. A principal or supervisor may deny the transfer of the applicant to his/her building if the most recent professional evaluation is less than satisfactory. Such denial will be sent to the applicant in writing.
- c. Teachers shall be limited to the acceptance of one such transfer per school year.

2. Initiated by the Board

The Board may choose to initiate involuntary transfers of teachers in order to achieve acceptable racial balance standards. When such action is undertaken by the Board it shall involve the least senior possible teachers from the buildings involved. In no case will such action be undertaken where the result would have the effect of causing the layoff of a teacher or teachers. Teacher(s) displaced by the Board under this procedure shall have the option (if possible) of simply trading positions or of exercising their rights as a displaced teacher under Article IX, Step 2 (to the extent it would not cause further deviation from staff acceptable racial balance standards). (Emphasis added).

ARTICLE IX

Reductions of Staff

Whenever reductions of staff (teachers) *either district-wide or within one or more buildings* (emphasis added), are undertaken by the Board, it shall be done in conformance with the following steps and principles:

Step 1—Identification of Displaced Teachers

- A. The Board shall notify the principal of a building or supervisor of a grouping of teachers (TEAM leaders, art, music, physical education and various special education and vocational education subdivisions, etc.) that a reduction of teachers is to take place and of the number (and subject, grade level, or specialty type) of teaching positions to be reduced within that building or grouping.
- B. The principal/supervisor shall then identify a number of teachers within that building/grouping equal to the reduction announced by the Board. Such identification shall be of the lowest seniority teacher within that building/grouping.

It is understood that senior teachers may volunteer to be identified as a teacher without an assignment, and may by such act of volunteering become a displaced teacher. Only teachers who have been identified as displaced teachers shall have a right to make use of the "bump" procedures outlined in later steps of this procedure.

- C. The principal/supervisor shall then determine whether or not the remaining teachers are certified and

qualified to staff the positions kept active within the building/grouping. It is recognized that such determination may involve the reassignment of teachers holding positions in the building/grouping; however, such reassignment shall honor, to the extent possible, the current assignments and aspirations of senior teachers within the building/grouping. (Within senior highs, care shall be taken to assure that North Central standards shall be observed in the assignment and/or reassignment of teachers. In middle school assignment/reassignment and qualification for same shall follow certification except for assignments in Foreign Language, vocal and instrumental music, library and vocational subjects (except for typing) which subjects shall depend upon identified majors and minors of academic study of the teacher and/or past successful teaching assignments within the last five (5) years.)

- D. 1. A panel will be constituted, consisting of two teachers and two administrators who have a master's degree in reading or have demonstrated proficiency in the teaching of reading at the primary level. That panel will establish criteria for and develop an eligibility roster of qualified first and second grade teachers (one list) who will form the pool of eligible applicants for vacant 1st and 2nd grade district-wide posted vacancies in those grades. If, in the case of a specific posted vacancy, no person from the eligibility roster applies, other applicants will be considered in accordance with the PNA. This provision shall not operate to interfere with provisions of this Agreement relative to minority staffing goals.

2. The hereinbefore mentioned panel will be selected by the following process: JEA will name one teacher. The Board will name one administrator. JEA will provide the Board with a list of three (3) teachers from whom the Board will pick one (1). The Board will provide JEA with a list of three (3) administrators from whom JEA will pick one (1).
 3. It is understood that the hereinbefore stated eligibility roster shall automatically include all teachers who are in place during the 1979-80 school year in a first or second grade assignment (including any split grade involving either first or second grade) together with all teachers who have successfully taught first or second grade on a regular or temporary assignment basis since January 1, 1976.
- E. If it is not possible to staff the remaining positions within a building/grouping with the senior teachers remaining after Step 1, C, then and only then, may junior teachers identified in Step 1, B (above) be assigned/reassigned to teaching positions within the building. Use of such junior teachers shall be on a basis of seniority (the most senior receiving preference) and such assignment/reassignment of identified junior teachers shall be kept to the lowest number possible.
- F. Teachers remaining without an assignment within a building/grouping when the provisions of Step 1 (A through D) have been completed shall be identified as displaced teachers.

Step 2—Bumping

Procedure for high seniority (upper 70%) teachers.

- A. A displaced teacher whose seniority number is within the most senior 70% of teachers as found on the district's official seniority list shall have the right to assume the position of any teacher within the lower 30% of the seniority list provided that the displaced teacher is qualified according to standards outlined in Step 1, C above. It is understood that such replacement may require minor reassignment of teachers within the building.
- B. If there is no position held by a teacher in the lower 30% of seniority which a displaced teacher desires, such displaced teacher shall replace the lowest seniority teacher beneath him/her assigned to a position in the area of the displaced teacher's last teaching assignment.
- C. If neither Step 2, A or B results in the assignment of the displaced teacher, then the displaced teacher shall be offered the position of the lowest seniority teacher (provided such teacher is junior to the displaced teacher) who is teaching in a position for which the displaced teacher is certified and qualified (using the standards set forth in Step 1, C above).

Procedure for low seniority teacher (lower 30%)

- A. A low seniority displaced teacher shall replace the lowest seniority teacher below him/her who is assigned to a position within the last teaching assignment of the displaced teacher.

- B. If Step 2, A (above) does not result in the assignment of the displaced teacher to a position, the displaced teacher may replace the lowest seniority teacher below him/her who has an assignment for which the displaced teacher is certified and qualified using the standards set forth in Step 1, C above.

Step 3—Layoff

Any teacher who remains without an assignment after the procedure of Reduction of Staff (Step 1 and 2) are followed shall be identified as laid off and shall be duly notified of same by the Board.

Step 4—Recall From Layoff

- A. As positions are reinstated or as they become vacant, teachers will be recalled to active employment with the Board in reverse order of layoff (the most senior laid off teacher being called back first), provided that such teacher is certified/qualified (as defined in Step 1, C above) for the vacant position.
- B. If the specific assignment of a laid off teacher is reinstated and such teacher is the senior teacher on layoff status such teacher may be recalled by withdrawing the layoff notice. Such action shall make posting of the vacancy unnecessary.
- C. *Recall from layoff shall be accomplished maintaining the minority ratio of teachers which existed prior to the layoff. (Emphasis added.)*
- D. No laid off teacher will be required to accept recall during the school year if such laid off teacher is enrolled in school or is under contract to teach in an-

other school district. The Board may accept other legitimate reasons for not returning.

- E. Teachers on layoff will lose their right to recall when their layoff time exceeds their seniority at the time of layoff or when they refuse callback (at a time other than during a school year or when they are under contract to another school district and when they cannot be released from such contract) whichever is the longer period of time.
- * * *

R. *Course on Minority Groups*

1. Each new probationary teacher shall be required to participate in or successfully complete for credit an in-service course offered by the Jackson Public Schools in the area of cultural heritage and history of minority groups in America. The course shall give special attention to the Black, Spanish-speaking and Indian American. Included in the course shall be a review of current instructional practices and curriculum.
2. This course shall be offered by the Jackson Public Schools at least once during the regular school year and shall be designed in such a way that one (1) semester hours of salary schedule credit, if desired, will be received by participants.
3. Teachers shall have the opportunity of taking the in-service course at no cost to themselves. The Board assumes no responsibility for payment of tuition or travel costs for teachers taking university or college credit courses.

4. Tenure teachers shall also be encouraged to take a course of study on minority groups.
 5. The in-service course will be evaluated and this evaluation will be reported to the Professional Council.
 6. The course shall consist of no more than five (5) sessions.
- S. The curriculum used in the school district shall reflect the multi-ethnic nature of our society. The curriculum shall reflect the contribution and achievements of minority groups in art, science, history, literature, and all life and cultures should be apparent in the design of materials.
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Civil No. 4-72340

THE JACKSON EDUCATION ASSOCIATION, INC.,
a non-profit Michigan corporation, LINDA BENSON, and
VIRGINIA DAVIS,

Plaintiffs,

v.

BOARD OF EDUCATION OF THE JACKSON PUBLIC
SCHOOLS,

Defendant.

FINDINGS OF FACT AND
CONCLUSIONS OF LAW

The Jackson Education Association, Inc. (Association), plaintiff herein, filed this suit on August 30, 1974 for itself and on behalf of Linda Benson and Virginia Davis, two black school teachers employed by defendant, the Board of Education of the Jackson Public Schools (Board). The Association is a labor organization with the meaning of Michigan's Public Employment Relations Act, M.C.L.A. §423.201, *et seq.*, and is the exclusive bargaining agent, *see* M.C.L.A. §423.211, for the teachers employed by the Board. The first count in the complaint filed by the Association alleges that, on September 7, 1973, the Association and the Board entered into a collective bargaining agreement effective as of September 1, 1973; that the employment practices of the Board, prior to the execution of the collective bargaining agreement, had, *inter alia*, the effect of discriminating against the employ-

ment of minority groups; and that, as a consequence of the alleged discriminatory employment practices, the parties agreed to include the following provision in the collective bargaining agreement:

The Board and the Association, in recognition of the desirability of multi-ethnic representation on the teaching faculty, hereby declare a policy of actively seeking minority group personnel. For the purposes of this contract, minority group personnel will be defined as those employees who are black, American Indian, Oriental, or of Spanish descendancy. The goal of such policy shall be to have at least the same percentage of minority racial representation on each individual staff as is represented by the student population of the Jackson Public Schools. (Article VII, ¶E.)

Count I also alleges that the parties agreed to the following provision as part of the proper layoff procedure:

In the event that it becomes necessary to reduce the number of teachers through layoff from employment by the Board, teachers with the most seniority in the district shall be retained, except that at no time will there be a greater percentage of minority personnel laid off than the current percentage of minority personnel employed at the time of the layoff. In no event will the number given notice of possible layoff be greater than the number of positions to be eliminated. Each teacher so affected will be called back in reverse order for positions for which he is certificated maintaining the above minority balance. (Article XII, ¶B, subparagraph 1.)

Count I further alleges that, on or about April 8, 1974, the Board took formal action to lay off seventy-five teachers (pursuant to its estimate that that many teaching positions had to be eliminated), including plaintiffs Davis

and Benson; that nineteen of the seventy-five teachers originally laid off were "minority group personnel" within the meaning of the collective bargaining agreement; that the Board failed to maintain the proper percentage of minority group personnel (the proper percentage, pursuant to Article XII, paragraph E, was 9.4% the "percentage of minority group personnel employed at the time of the layoff") because of its decision to retain eleven non-minority teachers that had achieved tenure status under the Michigan Teacher Tenure Act, M.C.L.A. sec. 38.71, et seq. (the Act), and to layoff eleven minority group teachers that had not yet achieved tenure under the Act (these eleven were on probationary status).

The second count of the complaint alleges only that the Board, in laying off plaintiffs Davis and Benson, violated Article X paragraph B of the collective bargaining agreement, and that as a direct result of this breach, plaintiffs suffered damages, including the loss of pay. Plaintiffs' prayer for relief seeks only that the court find that the Board breached Article XII, paragraph B of the collective bargaining agreement by failing to maintain the proper percentage of minority group personnel because of the layoff of plaintiffs Benson and Davis; that the court declare Article XII, paragraph B of the collective bargaining agreement to be not contrary to the provisions of the Teacher Tenure Act; that the court enjoin the Board from further violating the provisions of Article XII, paragraph B, i.e., that the court restrain the Board from laying off a greater percentage of minority group personnel than the percentage of minority group personnel employed at the time of any future layoff and that plain-

tiffs Davis and Benson¹ be awarded damages (for expenses incurred as a result of defendant's alleged breach of contract), back pay, reinstatement to their jobs, and "such other relief as may be just and equitable in the eyes of this Court."²

The Board admits all of the averments in the complaint except the allegation that, prior to the making of the collective bargaining agreement in September 1973, it had engaged in employment practices discriminatory to minority groups, and that such alleged discriminatory employment practices caused the alleged relative underemployment of minority group personnel. Defendant asserts, moreover, that its actions in laying off a greater percentage of minority group personnel than the total percentage of minority group personnel employed at the time of the layoff were compelled by the provisions of the Teacher Tenure Act, so that it could not adhere to the contract language which it views as contrary to, and subordinate to, the laws of the State of Michigan.

¹ All of the minority group personnel originally laid off in 1974 have been recalled with the exception of plaintiff Benson, who remains on the Systems Layoff Recall List although she has found alternative employment for the 1974-76 school years. Defendant contends that plaintiff Benson resigned her position to obtain full-time employment elsewhere and that plaintiff Davis taught in a program that had been abolished.

² The collective bargaining agreement under which this dispute arose was replaced by a successor agreement on September 1, 1975. The same language relating to layoff procedures was retained in the successor agreement. See Exhibit 13, Article XII, paragraph B, and affirmative action language was added to the existing contract. In the Spring of 1975, the Board laid off eighteen teachers but, in doing so, the language of the contract was followed.

The trial of this cause was ordered bifurcated, and on March 31, 1976, the court held a bench trial on the liability issue. Just prior to trial, plaintiff filed an amendment to paragraph A of Count I of the complaint.³ At trial, plaintiffs offered the testimony of the Executive Director of the Association and fifteen exhibits were admitted into evidence together with certain deposition testimony. At the conclusion of the trial, the cause was taken under advisement for preparation of the court's findings of fact and conclusions of law. When the court examined the evidence, it questioned its jurisdiction over this cause on its own motion.⁴ The parties were requested to submit briefs on that issue and they did so; after much consideration the court has concluded that it lacks jurisdiction over the subject matter of this action.⁵

³ Although the proposed amendment was filed on the first day of trial without leave of the court, we treat it as properly filed. The amendment seeks to include an allegation that the court properly has jurisdiction over the action pursuant to Title VII. As amended, paragraph of Count I reads:

A. This Court has original jurisdiction of the action here brought under the provisions of the United States Code, Title 28, 1343(3) and 1343(4) and under United States Code, Title 28, 1331, based upon violations of rights secured by and arising out of statutes (e.g., United States Code, Title 42, Section 2000d and 2000e-2(a) (1) and (2)) and the Constitution of the United States. The amount in controversy exceeds the sum or value of ten thousand (\$10,000.00) dollars, exclusive of interest and costs.

⁴ The Board did not raise the jurisdictional issue prior to or during the trial. It addressed itself to the jurisdictional issue only after the court raised it *sua sponte*.

⁵ Plaintiffs once again have sought to amend their complaint in an attempt to confer jurisdiction upon the court. To their brief on the jurisdictional issue, plaintiffs attached a motion for leave to amend their complaint to allege a violation of 42 U.S.C. § 1981.

In support of their allegations that defendant engaged in employment practices, prior to the making of the 1972 collective bargaining contract, that resulted in hiring policies discriminatory to minority personnel, *see* Complaint, Count I, paragraph F, plaintiff submitted Exhibits 14 and 15. Exhibit 14, supplied by the Board, merely sets forth the student racial mix and the number of minority teachers contained in the total teaching faculty.⁶ The evidence further demonstrated that the first black teacher in the City of Jackson was not hired until 1953. Following the 1968-69 academic year, the Board attempted to increase the percentage of minority teachers, causing the minority staff ratio to increase from 3.9% to 8.8% over the next three years. The Board did not begin to maintain student minority ratio statistics until the 1968-69 academic year. In 1972, Dr. Lawrence Read, then the superintendent of schools, reported the recommendations of the desegregation sub-committee to the members of the Board. One of these recommendations suggested that:

. . . the Board of Education direct the school administration to work towards a teaching staff, in the elementary schools, that also achieves a racial balance as close as possible to that of the students with a minimum of two black teachers in every school.

It is interesting to note that the evidence also demonstrated that there were not enough black teachers in the school system at that time to implement this recommendation.

⁶ Exhibit 15 represents an extension of the data contained in Exhibit 14. For example, Exhibit 14 sets forth the percentage of minority students contained in the total student enrollment together with the percentage of minority teachers employed by the Board.

Plaintiffs argue that the statistical data submitted in exhibit form sufficiently establish that the Board engaged in discriminatory hiring practices;⁷ that these allegations of racial discrimination in violation of the fourteenth amendment are sufficient to confer jurisdiction over this cause upon the court; that, once having established that this court has jurisdiction pursuant to the fourteenth amendment, the court has pendent jurisdiction to resolve their claims that the Board breached the collective bargaining agreement, the sole claims set forth by the complaint. The difficulty with plaintiffs' argument is that it assumes that the *de facto* imbalance disclosed by the statistical data in and of itself demonstrates a violation of the fourteenth amendment's equal protection clause. This simply is not so. *Washington v. Davis*, 44 U.S.L.W. 4789 (U.S. June 7, 1976). It is true, however, that statistical evidence may demonstrate that hiring and promotion practices of an employer have a racially differential impact sufficient to make out a *prima facie* case under Title VII. See, e.g., *Griggs v. Duke Power Co.*, 401 U.S. 424, 431 (1971); *Robinson v. City of Dallas*, 514 F.2d 1271, 1272-73 (5th Cir. 1975).⁸ The plaintiffs, however, have

⁷ Plaintiffs admit that when Dr. Lawrence Read became superintendent, the Board began a real effort to end the racial imbalance in the student enrollment at each school and in the teaching staff. Plaintiffs argue, however, that, notwithstanding the valiant efforts of Dr. Read the racial imbalance situation has not been rectified.

⁸ This is not to say, however, that statistical evidence tending to demonstrate a racially differential impact cannot be utilized in a non-Title VII racial discrimination case. In *Washington v. Davis*, *supra*, the Court, in speaking of such cases, stated that "[d]isproportionate impact is not irrelevant, but it is not the sole touchstone of an invidious racial discrimination forbidden by the Constitution." 44 U.S.L.W. at 4793.

not demonstrated that they fulfilled the jurisdictional prerequisites for a Title VII suit—they did not allege or demonstrate that discrimination charges were filed with the Equal Employment Opportunity Commission (EEOC), that they received a right-to-sue letter from EEOC, or that they timely acted upon a right-to-sue letter. 42 U.S.C. §2000e-5. See, e.g., *Alexander v. Gardner-Denver Corp.*, 415 U.S. 36, 47 (1974); *McDonnell Douglas Corp. v. Green*, 411 U.S. 792, 798 (1973).

The proofs presented at trial were not directed at establishing violations of the fourteenth amendment, Title VII, or any other statute forbidding racial discrimination. Nor did plaintiffs ever make averments sufficient to establish such violations. The complaint, as well as the proofs offered at trial, demonstrated that this dispute centers about a conflict between the provisions of the collective bargaining agreement and state law as interpreted by defendant. Plaintiffs' contractual claim arises under state law and the parties have not shown, nor could they, that the court has jurisdiction over it. The parties are not of diverse citizenship and the contractual claim can in no way be considered pendent to any federal claim since it does not arise out of a common nucleus of operative fact. Any federal claim advanced by plaintiffs was advanced to set forth a pretextual jurisdictional basis so that the court could decide the real dispute between the parties—the contractual claim. The contract dispute is, however, a state law matter and the state courts are fully able to resolve any real or apparent conflict between the Michigan Teacher Tenure Act and the collective bargaining agreement's provisions. The court does not have jurisdiction over plaintiffs' asserted Title VII claim because of plain-

tiffs' total failure to comply with the jurisdictional prerequisites to a Title VII action. The complaint was amended to allege 42 U.S.C. §2000d as a jurisdictional basis, but plaintiffs made no attempt to include averments in their complaint or to introduce any evidence at trial to support such a claim.⁹

Accordingly, we conclude that the jurisdictional averments contained in the complaint are insufficient to vest this court with jurisdiction over the Title VII cause of action asserted by plaintiff and that the non-Title VII causes of action, advanced by amendments to the complaint, are unsupported by the evidence.

/s/ Robert E. DeMascio
United States District Judge

Dated: December 15, 1976

⁹ 42 U.S.C. § 2000d, et seq., prohibits discrimination on the basis of race, color or national origin against any person or by anyone in a program or activity receiving federal financial assistance. Here, however, plaintiffs' claim of discrimination revolves about the contractual dispute and there has been no showing whatsoever that defendant's allegedly discriminatory actions were motivated by a racial animus.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Civil No. 4-72340

THE JACKSON EDUCATION ASSOCIATION, INC.,
a non-profit Michigan corporation, LINDA BENSON and
VIRGINIA DAVIS,

Plaintiffs,

v.

BOARD OF EDUCATION OF THE JACKSON PUBLIC
SCHOOLS,

Defendant.

JUDGMENT

This matter having come before the court for trial, and the court having filed its Findings of Fact and Conclusions of law.

IT IS ORDERED AND ADJUDGED

that the plaintiffs take nothing from their complaint and that the action is dismissed with prejudice and without costs.

Dated at Detroit, Michigan, this 15th day of December 1976.

/s/ Robert E. DeMascio
United States District Judge

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE
COUNTY OF JACKSON

FILE NO.: 77-011484CZ

JACKSON EDUCATION ASSOCIATION, INC., a non-profit Michigan corporation, VIRGINIA DAVIS and LINDA BENSON STOKES,

Plaintiffs,

-v-

BOARD OF EDUCATION OF THE JACKSON PUBLIC SCHOOLS,

Defendant.

OPINION
(Sept. 6, 1979)

This litigation began on August 30, 1974, when plaintiffs filed a complaint in the U. S. District Court for the Eastern District of Michigan. On January 12, 1977, Judge Robert DeMascio issued an order stating:

“Moreover, the court declined to entertain plaintiff’s state contract claim, plaintiff is, therefore, free to pursue his state remedies.”

On February 1, 1977, the plaintiffs filed a claim of appeal in the 6th Circuit Court of Appeals. This appeal was dismissed by stipulation on May 25, 1977.

The plaintiffs filed a complaint in the Jackson County Circuit Court on January 25, 1977, alleging breach of contract. The defendant filed a motion for summary judgment and accelerated judgment on March 8, 1977 and in an order dated June 13, 1977, the Honorable Charles Fal-

ahee rendered an opinion granting the motion for accelerated judgment without prejudice since the action in the federal courts was pending at the date of the filing of the complaint. This action was then filed in June of 1977.

The pleadings and exhibits in the federal court were submitted to this court for its consideration by stipulation of the parties along with agreed statements of fact and the court makes its findings of fact as follows:

In November of 1971, one of the defendant’s administrators recommended to the members of the racial subcommittee of the school’s advisory council that there be increased recruitment of minority teachers plus increased protection of minority teachers from lay-offs. At that time 15.9% of the students were classified as members of minorities whereas, 8.8% of the faculty were minority members. This had increased to that figure in one year from a percentage of 5, after an intensified affirmative action hiring policy by the school district.

The successful recruitment of minority teachers continued to be a burden, however, due to economic circumstances and decreasing student enrollment. The straight seniority system mandated by the then existing collective bargaining agreement imposed the primary burden of lay-offs on the “last hired.” The “last hired” were the very minority teachers the system was trying to recruit and retain. The affirmative action program was impeded by the effects of the seniority system. The school superintendent stated in his deposition at page 24:

“When you went into the meeting place with a pink slipping, you saw a lot of black faces there. As a matter of fact, it did literally wipe-out all of the gain

that has been made in terms of affirmative action to bring that about."

In February, 1972, the school district, according to Superintendent Reed, "experienced a violent explosion at Jackson High School, probably the worst we had had," which included fighting and rioting among the students because of racial conflicts.

In order to achieve the end of a truly integrated school system, representatives of the board and of the Teacher's Education Association reached an agreement effective July 1, 1972, which insured increased minority hiring and increased protection from lay-offs for the newly hired teachers.

Article VII, Paragraph E of the Collective Bargaining Agreement set forth the mutual goal of the parties:

"The Board and the Association, in recognition of the desirability of multi-ethnic representation on the teaching faculty, hereby declare a policy of actively seeking minority group personnel. For the purposes of this contract, minority group personnel will be defined as those employees who are Black, American Indian, Oriental or of Spanish descendancy. The goal of such policy shall be to have at least the same percentage of minority racial representation on each individual staff as is represented by the student population of the Jackson Public Schools."

To carry out the announced goal of the parties, the Board and the Association provided at Article XII, Paragraph B, Subparagraph 1 as follows:

"In the event that it becomes necessary to reduce the number of teachers through layoffs from employment by the board, teachers with the most seniority in the district shall be retained, except that at no

time will there be a greater percentage of minority personnel laid off than the current percentage of minority personnel employed at the time of the lay-off."

In the spring of 1973, lay-offs were necessary and the contract language was followed. The same affirmative action and lay-off language was continued in the successor agreement in 1973.

In April of 1974, the school district announced the impending lay-off of 75 teachers, 19 of whom were minority personnel. The ratio of minority personnel on the staff at said time was 11.1%. Ignoring the contract language and the ratio figure, the board chose to retain all tenure teachers and failed to maintain the percentage of minority personnel which existed at the time of the lay-off.

Plaintiffs pray for a declaratory judgment that the defendant has breached the collective bargaining agreement by laying off the plaintiff individuals and any other minority personnel then similarly situated and further that the court order the reinstatement of the plaintiffs and award them compensatory damages. The defendant moves for a summary judgment pursuant to GCR 1963, 117.2(1).

It has not been established that the board had discriminated against minorities in its hiring practices. The minority representation on the faculty was the result of societal racial discrimination.

It is the defendant's position that the lay-offs were proper because if the plaintiff probationary teachers were retained to maintain the racial balance required by the collective bargaining agreement, the defendant would have had to lay-off tenured personnel in their stead in

violation of the Teacher Tenure Act. (MCLA 38.105; MSA 15.2005).

The Teacher Tenure Act insofar as relative provides:

MCLA 38.101, Article 4, Section 1:

"Discharge or demotion of a teacher on continuing tenure may be made only for reasonable and just cause, and only after such charges, notice, hearing, and determination thereof as are hereafter provided."

MCLA 38.105, Article 4, Section 5:

"Any teacher on permanent tenure whose services are terminated because of a necessary reduction in personnel shall be appointed to the first vacancy in the school district for which he is certified and qualified."

MCLA 38.1072, Article 10, Section 2:

"No teacher may waive any rights and privileges under this act in any contract or agreement made with the controlling board. In the event that any section or sections of a contract or agreement entered into between a teacher and the controlling board make continuance of employment of such teacher continued upon certain conditions which may be interpreted as contrary to the reasonable and just causes of dismissals, provided by this act, such section or sections of a contract or agreement shall be invalid and of no effect in relation to the termination of employment of such teacher."

The plaintiffs contend there is no conflict between the Tenure Act and the collective bargaining agreement because the agreement speaks of "lay-offs" and not "terminations" as used in the Tenure Act. Webster's Third New International Dictionary (1966) page 1281 defines "lay-off" as follows:

"To cease to employ a worker, usually temporarily, because of slack in production and without prejudice to the worker-usually distinguished from fire."

"Termination" is defined at 2359 of this volume as follows:

"To end formally and definitely (his employment with the company was terminated.) To discontinue the employment of: discharge."

Judge Learned Hand in an analogous situation involving veterans preferences, ruled as follows: "Discharge" as used in statute declaring that veteran shall not be discharged from position to which he has been restored within one year after restoration, means a permanent end to relation of "lay-off", which contemplates a period during which a worker is temporarily dismissed or allowed to leave his work or that part of the year during which activity is partially or completely suspended. *Fishgold v Sullivan Dry Dock and Repair Corp*, 154 F 2d 785 at 788 (1946).

The defendant argues that unless the Tenure Act also covers lay-offs, the spirit and purpose of the Teacher Tenure Act would be violated.

However, in interpreting the Teacher Tenure Act, the Michigan Court of Appeals stated in *Goodwin v Kalamazoo Board of Education*, 82 Mich App 559, 267 NW2d 142 (1978), that "only when a statute is ambiguous is a court forced to examine legislative intent." If the Legislature in enacting the Tenure Act had intended to include lay-offs, it would have been a simple matter to include such wording. "The Legislature has seen fit to include no such condition and the court is without any power to write it in under the guides of judicial construction."

Ford Motor Company v Unemployment Compensation Commission, 316 Mich 776 (1947).

It has further been ruled in the federal courts that "to declare provisions of a collective bargaining agreement void it must be on the basis of clear and distinct legal principles." *Jersey Central Power & Light Company v. Local Union*, 508 F 2d 687, page 704 (1975). In interpreting the Tenure Act in Michigan, the Appellate Court ruled in *Bruisma v Wyoming Public Schools*, 38 Mich App 745, 749 (1972), that "Article 4, Section 5 of the Act does not excuse a district from honoring a valid contract."

In *Rehburg v Ecorse School District No. 11*, 330 Mich 541, 545 (1951), the court discussed the primary purpose of the Tenure Act.

"To maintain an adequate and competent teaching staff, free from political and personal arbitrary interference.

"It promotes good order and the welfare of the state and of the school system by preventing removal of capable and experienced teachers at the personal whims of changing office holders."

Plaintiffs rely on that portion of *Franks v Bowman Transportation*, 424 US 747, 778-79; 96 SCt 1251; 47 LEd 2d 444 (1976) which states:

"The court has also held that a collective bargaining agreement may go further, enhancing the seniority status of certain employees for purposes of furthering public policy interests beyond what is required by statute, even though this will to some extent be detrimental to the expectations acquired by other employees under the previous seniority agreement. *Ford Motor Company v Huffman*, 345 US 330; 97

LEd 1048; 78 SCt 681 (1953). And the ability of the union and employer voluntarily to modify the seniority system to the end of ameliorating the effects of past racial discrimination, a national policy objective of the 'highest priority' is certainly no less than in other areas of public policy interests. (Citations omitted.)"

Both parties agreed to the concept of increased minority hiring and retention of minority teaching personnel in an integrated school system. The lay-off plan promoted "good order and the welfare of the state and of the school system" and was entirely consistent with the announced goals of the Tenure Act.

The court finds that there is no conflict between the Michigan Teacher Tenure Act and the collective bargaining agreement entered into by the parties to this suit. Defendant's motion for summary judgment based upon such a conflict is denied.

The Board further argues that the contract provisions for affirmative action violates the Civil Rights Act of 1964 and the Michigan Civil Rights Act of 1977 in that it sets up a racial quota or racial goal and such are necessarily discriminatory.

Racial quotas are no *per se* violative of the Constitution where they are used as remedial measures to assure the disestablishment of state-established discriminatory school systems. The US Supreme Court in *US v Montgomery Board of Education*, 395 US 225, 232 Ed 2d 263, 89 SCt 1670 (1969), approved a district judge's order providing for a scheduled desegregation of faculty and staff on a ratio basis after the school board had failed to make adequate progress toward faculty desegregation.

On March 24, 1972, Title VII of the Civil Rights Act of 1964 was amended to make illegal racial discrimination by public employers.

However, under Section 706(g) of Title VII, Congress provided for such "affirmative action as may be appropriate" in the law concerning the propriety of racial goals thereunder, as was stated in *EEOC v Local*, 638, 532 Fd 2d 821 (2d Circuit 1976), page 828.

"The imposition of racial goals is to be tolerated only when past discrimination has been clear-cut and the effects of 'reverse discrimination' will be diffused among an unidentifiable group of unknown, potential applicants rather than upon an ascertainable group of easily identifiable persons."

To like effect are *Detroit Police Officers Assn v Young*, 446 F Supp 979 (1978); *Kirkland v New York State Department of Corrections*, 520 F 2d 420 (2d Circuit 1975); *Bridgeport Guardians v Civil Service Com'n*, 482 F 2d 1333 (2d Circuit 1973).

The common thread running through each of these cases was the precept that no employer could be trusted to form a fair program for increasing minority participation; affirmative action plans must be imposed by the courts. These cases did not discuss programs where all the parties agreed to a plan to increase minority representation.

Article 12, Paragraph B of this instant contract is a racial quota. It is a quota which effects an ascertainable group of easily identifiable persons. The white tenure teachers who would be laid-off pursuant to said quota are an easily identifiable group for whom the hardship of reverse discrimination would be direct, obvious and per-

sonal. There is no history of overt past discrimination by the parties to this contract.

In the US Supreme Court decision in *Teamsters v United States*, 45 Law Week 4506 (1977), the Court held that a facially neutral seniority plan, operating on the concept of a "last-hired, first fired" is not discriminatory against minority personnel even though they are disproportionately effected.

In the instant case the parties agreed to an affirmative action plan which would, in the event of lay-offs, disproportionately discriminate against some white tenure teachers who had more seniority than those minority teachers to be retained under the percentage quota of proportionate lay-offs based upon racial make-up of the teachers and minority students.

Here the parties impliedly agreed that there had been societal discrimination against minorities in securing an education and employment as teachers and determined to do something to remedy the situation. That something was the execution of the affirmative action provisions of their collective bargaining agreement.

The affirmative action provisions were kept in when the contracts were renewed. Progress in increased minority faculty was made and eventually when the minorities were in relative proportion to the number of minority students, then such provisions could be removed from the contract.

The Supreme Court's decision in *University of California Regents v. Baake*, 46 LW 4896 (1978), is of little help since it only decided that under the factual situation

presented, race may be considered as a factor in college admissions but racial quotas are inherently suspect and must be justified by the state to show they are constitutionally permissible and their use is necessary to the accomplishment of a substantial state interest.

On June 27, 1979, the US Supreme Court ruled in *United Steel Workers of America v Weber et al*, 47 US LW 4851 that it was a permissible affirmative action plan where there was a master collective bargaining agreement covering terms and conditions of employment at 15 Kaiser plants which included affirmative action plans to eliminate conspicuous racial imbalances in Kaiser's then almost exclusively white staff work forces by reserving for black employees 50% of the openings in in-plant craft training programs until the percentage of black workers in a plant was commensurate with the percentage of blacks in the local labor force.

Weber, a white production worker, brought the action alleging that junior black employees were receiving training in preference to more senior white employees who were thus discriminated against in violation of Title VII of the Civil Rights Act of 1964.

The Court reasoned that if Congress had meant to prohibit all racial conscious affirmative actions, it could have provided that Title VII would not require or *permit* racially preferential integration efforts.

The Court stated that it did not believe that it was necessary to define the line of demarcation between permissible and impermissible affirmative action plans in deciding the Kaiser-USWA plan was permissible. It merely cited the purposes of the plan mirrored those of

the statute in breaking down old patterns of racial segregation and hierarchy; opening employment opportunities in occupations traditionally closed; it did not unnecessarily trammel the interests of whites since 1/2 of the trainees would be white and the plan was a temporary measure not intended to maintain racial balance but simply to eliminate a manifest racial imbalance.

In the instant case, the Board and the Union tried to be a part of the solution to societal discrimination when they executed the affirmative action contract. They had no intention of creating a problem of discrimination. Then the court rulings came out which could be construed to say that the Board was unlawfully discriminating against white teachers under the provisions of Title VII of the Civil Rights Act of 1964.

As stated in *Weber, supra*,

"It would be ironic indeed if a law triggered by a Nation's concern over centuries of racial injustice and intended to improve the lot of those who had 'been excluded from the American dream for so long.' 110 Cong. Rec., at 6552 (remarks of Sen. Humphrey), constituted the first legislative prohibition of all voluntary private, race-conscious efforts to abolish traditional patterns of racial segregation and hierarchy."

Refusal to rule such programs constitutional would have the effect of delaying even the most elementary equality in the work place for another twenty years. Vernon E. Jordan Jr., *To Be Equal, The Blazer* (July 24, 1978).

Senator Humphrey said in his discussion of the legislation, 110 Cong. Rec., at 6547, "How can a Negro child be motivated to take full advantage of integrated educa-

tional facilities if he has no hope of getting a job where he can use that education?"

To which we add, how can a minority child aspire to a teaching career or other career requiring an advanced education if a disproportionately small number of such minority teachers are represented in the school system?

The effects of such daily observed societal discrimination discourage his ambition; the effects of such daily observed societal discrimination feed and encourage racial hatred and distrust of "whitey"; the effects of such daily observed societal discrimination create excuses for the non-achiever, or the indolent, minority student.

Voluntary affirmative action plans are to be encouraged since the very foundation of this country can be secure only if the citizens work out most of their problems voluntarily and without the intrusion of "Big-Brother Courts" to monitor and direct every facet and phase of their relationships.

To hold that affirmative action plans are invalid unless promulgated by a court after a finding of past discrimination as the pre-*Weber* cases held, is to say that all employers, all employees, and all unions, are irresponsible and not to be trusted with the conduct of their own daily affairs, i.e., democracy is a failure and only the bureaucrats, (here the courts) are to be trusted with such matters. Happily, the life depicted in Orwell's *1984* is still not our way of life.

Weber, *supra*, is controlling. The fact that the Board is not a private employer does not excuse its liability and duties under the subject contract. Governmental agencies

get their authority from (sic) all the people and must, therefore, conduct themselves in such fashion as to give the greatest benefit to the public weal.

This court finds that the instant collective bargaining plan is a permissible affirmative action plan violative of no law. A declaratory judgment shall enter finding that the individual plaintiffs were laid-off in violation of Paragraph 3 of Article XVII of the collective bargaining agreement between the Jackson Public Schools and the Jackson Education Association, Inc., and are entitled to such relief and damages as the court shall determine in further hearings. The motions for summary judgments are denied.

Counsel for plaintiffs shall prepare a declaratory judgment in conformity with this opinion. No costs are to be taxed in that a public question is involved and there is nothing to indicate that the Board did not act under color of law as it appeared to them at the time of the lay-offs.

/s/ Gordon W. Britten P11216
Circuit Court Judge

DATED: August 31, 1979

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Civil Action File No. 81-60156

WENDY WYGANT, et al.,
Plaintiffs,
vs.

JACKSON BOARD OF EDUCATION, et al.,
Defendants.

AFFIDAVIT RE MINORITY
TEACHERS WITH SENIORITY

STATE OF MICHIGAN)
COUNTY OF INGHAM) ss.

Susan Diebold, being first duly sworn, deposes and says that:

1. Affiant is a plaintiff and a teacher in the Jackson Board of Education school system.

2. Attached is a true and exact copy of seniority list of the Jackson School System.

3. Said list shows:

a. The percentage of minority teachers in 1972 was 8.3%.

b. The percentage of minority teachers in 1976 was 10.2%.

c. The percentage of minority teachers in 1981 was 12%.

4. Therefore, according to the defendant Board's said seniority list, there have been new hires, since the 1972 affirmative action clause was instituted.

5. Further, said list ("m" indicating minority), clearly shows that more than the "4 or 5" minority teachers would have been left in 1976, if ordinary seniority had been used, contrary to defendants' argument and claim.

6. It can be seen that there were many high-seniority minority persons at all times herein relevant.

7. Since 1972, 126 new teachers have been hired, of which 25% were minorities.

8. In 1978, the defendant School Board sent out recruiters to the South and elsewhere, seeking minority teachers to hire, upon information and belief.

Further, deponent says not.

/s/ Susan Diebold
Affiant

Thomas Rasmusson (P19242)
Attorney at Law
501 S. Capitol Avenue
Suite 305
Lansing, MI 48933

STATE OF MICHIGAN)
) ss.
 COUNTY OF JACKSON)

On this 24th day of February, 1982, personally appeared before me, a Notary Public, in and for said county and state, the above-named, Susan Diebold, who acknowledged that she has read the foregoing by her subscribed, and knows the contents thereof, and that the same is true of her own knowledge except those matters therein stated on information and belief, and as to those matters she believes them to be true.

/s/ Linda R. Thayer

Notary Public, Jackson Cty, MI

My Commission Expires: May 30, 1983

JACKSON PUBLIC SCHOOLS

March 1, 1981

TEACHER SENIORITY LIST

40-04-10-00	Beach, Dorothy	Elem. Perm.	K-8 All Subjects
44-09-01-00	Sarata, Stella	Elem. Perm.	K-8 All Subjects
45-04-10-00	Hamilton, Eva	Elem. Perm.	K-8 All Subjects; 9-12 Violin
47-09-01-00	Devor, Delphine	Elem. Perm.	K-8 All Subjects
49-05-03-00	Rohde, Catherine	Elem. Perm.	K-8 All Subjects
50-04-13-00	Miller, Gertrude	Elem. Perm.	K-8 All Subjects
50-09-01-00	Owens, Clarence	Sec. Perm.	7-8 All Subjects; 9-12 Natural Science, Geography, History
51-08-07-00	Mesko, George	Sec. Perm.	7-8 All Subjects; 9-12 Math, Economics, Gen. Business
51-08-17-00	Goolian, Zabelle	Sec. Perm.	7-8 All Subjects; 9-12 French, Soc. Sci., English, K-12 Guid. Counselor
51-09-01-00	Hartsuff, Maurice	Sec. Cont.	7-8 All Subjects; 9-12 History, Soc. Sci., Agric. Educ.; K-12 Guidance Counselor
51-09-01-00	Ericksen, Robert	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts, Soc. Sci., Machine Shop
51-09-01-00	Richter, Richard	Sec. Perm.	7-8 All Subjects; 9-12 Speech, Soc. Sci., Biology, Science; K-12 Physical Education

52-04-06-00	Meyer, Dorothy	Elem. Perm.	K-8 All Subjects
52-04-15-00	Kalmbach, Phyllis	Elem. Perm.	K-8 All Subjects
52-09-02-00	Bender, George	Sec. Perm.	7-8 All Subjects; 9-12 Science, Biology, Soc. Sci.; K-12 Phys. Education
52-09-02-00	Furnas, Herbert	Sec. Perm.	7-8 All Subjects; 9-12 Math, Poli. Sci., English, History; K-12 Guidance Counselor
53-04-26-00	<i>retired 7/81</i> Hunt, Phillip	Sec. Perm.	7-8 All Subjects; 9-12 Commerce, Bus. Admin., Phys. Ed.
53-06-06-00	Buekers, John	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts, Agric. Educ., Engineering Drawing
53-06-30-00	<i>retired 6/81</i> Tramp, George	Sec. Perm.	7-8 All Subjects; 9-12 History, Geography, Geology
53-09-08-00	Fowler, Phillip	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Soc. Sci., English, Speech
54-04-20-00	Morris, Ruth	Elem. Perm.	K-8 All Subjects
54-04-26-00	Bridges, William	Sec. Perm.	7-8 All Subjects; 9-12 History, Geography, K-12 Ind. Arts, Guidance Counselor

54-04-28-00	Inman, Mary Ann	Sec. Perm.	7-8 All Subjects; 9-12 English, French, Latin; K-12 Homebound, Guidance Counselor
54-05-24-00	Persing, Margaret	Elem. Perm.	K-8 All Subjects; 9-12 Blind Ed.
54-06-14-00	Pawlak, Anthony	Elem. Perm.	K-8 All Subjects
54-11-05-00	Denby, Marian	Elem. Perm.	K-8 All Subjects
55-02-24-00	Oren, Conway	Sec. Perm.	7-8 All Subjects; 9-12 Gen. Science, Agr. Farm Seop.; Voc. Trade & Industrial
55-03-14-00	Hawkins, Eldon	Elem. Perm.	K-8 All Subjects
55-04-21-00	Murphy, Kevin	Sec. Perm.	7-8 All Subjects; 9-12 English, Science, Soc. Sci.
55-04-31-00	Dailey, Katheryne	Sec. Perm.	7-8 All Subjects; 9-12 Art, History, Drawing & Design; K-12 Teacher of the Blind
55-05-13-00	Klitzing, Jane	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Recreation; K-12 Health and Physical Education
55-06-25-00	Grogan, Clara	Sec. Perm.	7-8 All Subjects; 9-12 Math, Span., French; K-12 Lib. Sci.

55-08-19-00	Goudreau, Helmi	Elem. Perm.	K-8 All Subjects
	<i>retired 6/81</i>		
55-09-12-00	Patterson, Russell	Sec. Perm.	7-8 All Subjects; 9-12 Trade & Ind., Ind. Arts, Soc. Sci., Psychology, Speech
	<i>retired</i>		
56-04-11-00	Lasowski, Edward	Sec. Perm.	7-8 All Subjects; 9-12 English, Nat. Sci.; K-12 Phys. Ed.
56-04-11-00	Stinnett, Jeffery	Elem. Perm.	K-8 All Subjects
56-04-26-00	Espie, William	Elem. Perm.	K-8 All Subjects
56-05-19-00	Fedore, William	Sec. Perm.	7-8 All Subjects; 9-12 Zoology, Soc. Sci., Phys. Sci.
56-05-22-00	Hammersley, John	Sec. Perm.	7-8 All Subjects; 9-12 Social Science, Commerce
56-06-04-00	Prahl, Edward	Sec. Perm.	7-8 All Subjects; 9-12 English, Ind. Arts, Soc. Sci., Science
56-06-19-00	Jenkins, Lucille	Elem. Perm.	K-8 All Subjects
56-07-05-00	Tibbitts, Warren	Sec. Perm.	7-8 All Subjects; K-12 Phys. Educ.; 9-12 Soc. Sci., History, K-12 Health
56-07-17-00	West, A. Vance	Sec. Perm.	7-8 All Subjects; K-12 Art; 9-12 Soc. Sci., English

56-08-16-00	Grogan, Max	Sec. Perm.	7-8 All Subjects; 9-12 Drawing & Design, English & Speech; K-12 Art
56-09-31-00	Jansen, Patricia	Elem. Perm.	K-8 All Subjects
57-03-15-00	Ekster, Madge	Elem. Perm.	K-8 All Subjects
57-03-18-00	Hartzler, Genevieve	Sec. Perm.	7-8 All Subjects; 9-12 Hygiene, Physiology, Chem.; K-12 P.E.
57-03-25-00	Woodring, Mary Lou	Elem. Perm.	K-8 All Subjects
57-04-23-00	Raczkowski, Walter	Elem. Perm.	K-8 All Subjects;
		Sec. Perm.	9-12 Soc. Sci., Phys. Educ.
57-05-07-00	Linqest, Genevieve	Elem. Perm.	K-8 All Subjects
57-05-24-00	Whitson, Alexander	Sec. Perm.	K-8 All Subjects; 9-12 English
		Elem. Cont.	Voc. Tech.; K-12 Art; 9-12
		Voc. Cert.	Voc. Educ. Drafting
57-06-03-00	Hill, Richard	Sec. Perm.	7-8 All Subjects; 9-12 Math, Science
57-07-01-00	Parsons, Warren	Sec. Perm.	7-8 All Subjects; 9-12 Agric., Farm Shop, Gen. Sci., Soc. Sci., Voc. Agric., Farm Shop
57-07-25-00	Johnson, Richard	Sec. Perm.	7-8 All Subjects; 9-12 English, Soc. Sci.; K-12 Health & P.E.
57-07-23-00	Dunlap, Marie	Elem. Perm.	K-8 All Subjects

57-08-23-00	Snyder, Faye	Elem. Perm.	K-8 All Subjects
57-09-09-00(M)	Swint, Pearl	Elem. Perm.	K-8 All Subjects; K-12 Guid. Counselor
57-11-25-00	Carlson, Joan	Elem. Perm.	K-8 All Subjects
58-01-17-00	Acker, Gaylord	Elem. Perm.	K-8 All Subjects; K-12 Guid. Counselor
58-01-24-00	Macfarlane, Charles	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts, Drawing & Design
58-03-05-00	Winters, Constance	Elem. Perm.	K-8 All Subjects
58-04-24-00	Stellingworth, Jean	Elem. Perm.	K-8 All Subjects
58-04-25-00	Whittaker, Rachael	Elem. Perm.	K-8 All Subjects; K-12 Guid. Counselor; School Soc. Wkr.
<i>retired 6/81</i>			
58-05-01-00	Boyle, Ruth	Sec. Perm.	7-8 All Subjects; 9-12 English, Soc. Sci., Chem., Biology
58-06-02-00	Schaefer, Robert	Sec. Perm.	7-8 All Subjects; 9-12 Agric., Gen. Sci., Farm Mech.
58-06-10-00	LaBonte, Mark	Sec. Perm.	7-8 All Subjects; 9-12 Science, Ind. Arts, Soc. Sci.
58-06-13-00	Nearpass, Don	Sec. Perm.	7-8 All Subjects; 9-12 P.E., Phys. Sci., Soc. Sci., Math

<i>retired 6/81</i>			
59-01-09-00	Troyer, Carol	Sec. Perm.	7-8 All Subjects; 9-12 English, Music Theory; K-12 P.S. Mus.
59-03-24-00	Pultz, Peter	Sec. Perm.	7-8 All Subjects; 9-12 Math, Physics, Phys. Educ.
59-05-07-00	Klomprens, Frank	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Ed., Soc. Sci., Ind. Arts
59-09-15-00	Minor, Abby Lou	Elem. Perm.	K-8 All Subjects
60-03-28-00	Brenton, Rhoda	Elem. Perm.	K-8 All Subjects
60-04-02-00	Dearing, Nancy	Elem. Perm.	K-8 All Subjects
60-04-25-00	Varmer, Marjorie	Elem. Perm.	K-8 All Subjects
60-05-02-00	Winters, Harold	Sec. Perm.	7-8 All Subjects; 9-12 Nat. Sci., Biol., Chem., German
60-05-13-00	Okonek, Frances	Sec. Perm.	7-8 All Subjects; 9-12 English, History, K-12 Library Science
60-05-23-00	Rappleye, Donald	Sec. Perm.	7-8 All Subjects; 9-12 Geog., Soc. Sci., Biology
60-05-25-00(M)	Breeding, Carl	Sec. Perm.	7-8 All Subjects; 9-12 Math, Chemistry, Phys. Science
60-05-27-00	Wright, Robert	Sec. Perm.	7-8 All Subjects; 9-12 Biology, History, Math; K-12 Phys. Ed.

60-06-03-00	Niedzielski, Ronald	Elem. Perm.	K-8 All Subjects; K-12 Speech Correction
60-06-08-00(M)	Smith, Harry	Sec. Perm.	7-8 All Subjects; 9-12 History, Social Science
60-07-18-00	Graham, Dorothy	Sec. Perm.	7-8 All Subjects; 9-12 History, Spanish, French
60-08-16-00	Fisher, Keith	Sec. Perm.	7-8 All Subjects; 9-12 Bus. Education, Social Science
60-08-17-00	Weible, Margaret	Elem. Perm.	K-8 All Subjects
60-09-03-00	Lameika, Orthella	Elem. Perm.	K-8 All Subjects
60-09-28-00	Rossmann, Marilyn	Elem. Perm.	K-8 All Subjects
61-02-07-00	Server, Margaret	Elem. Perm.	K-8 All Subjects
61-05-01-00	McConnell, Helen	Elem. Perm.	K-8 All Subjects
61-05-26-00	Bernardson, Milo	Sec. Perm.	7-8 All Subjects; 9-12 Physics, Geology, Math, Driver & Safety Education
61-06-01-00	Chipman, Herbert	Elem. Perm.	K-8 All Subjects
61-06-05-00	Nordman, Charles	Sec. Perm.	7-8 All Subjects; 9-12 Spanish, Other
61-07-03-00	Avis, Myrtle	Elem. Perm.	K-8 All Subjects; Consultant for Mentally Handicapped

61-08-02-00	Brant, Barbara	Sec. Perm.	7-8 All Subjects; 9-12 English, Speech; K-12 Deaf Education, Speech Correction
61-08-16-00	Hall, Jeanette	Elem. Perm.	K-8 All Subjects
61-08-17-00	Garnett, Kenneth	Elem. Perm.	K-8 All Subjects
61-08-29-00	Darling, Ollie	Elem. Perm.	K-8 All Subjects
61-10-23-00	Doty, Marguerite	Sec. Perm.	7-8 All Subjects; K-12 Art
61-11-22-00(M)	Simmons, Ernestine	Elem. Perm.	K-8 All Subjects; K-12 P.E.
62-01-14-00	Blake, Peter	Sec. Perm.	7-8 All Subjects; 9-12 Speech, Social Science, English
62-02-21-00	Runkel, Thomas	Sec. Perm.	7-8 All Subjects; 9-12 Soc. Sci., Accounting & Law, English, Secretarial Training
62-04-06-00	Collins, Rheta	Elem. Perm.	K-8 All Subjects; School Social Worker
62-05-09-00	Valas, Dale	Sec. Cont. Full Voc. Cert.	7-8 All Subjects; 9-12 Econ., Bus. Education, Social Science; 9-12 Voc. Bus. Educ., General Office Clerical, Steno & Secretarial; Typing & Related Occupations, Clerical & Secre. Lab.
62-05-24-00	Hagey, Dorothy	Elem. Perm.	K-8 All Subjects

retired

62-06-02-00	(M) Williams, Libra	Elem. Perm.	K-8 All Subjects
62-06-12-00	Wheeler, Darrel	Sec. Perm.	7-8 All Subjects; 9-12 Math, Chemistry, Phys. Science
62-06-19-00	Haselswerdt, Jean	Elem. Perm.	K-8 All Subjects
62-06-20-00	Walters, Beverly	Elem. Perm.	K-8 All Subjects
62-07-23-00	Krumm, Kathleen	Sec. Perm.	7-8 All Subjects; 9-12 English, Social Science
63-02-01-00	Straayer, Carole	Elem. Perm.	K-8 All Subjects
63-02-28-00	Damm, Jane	Elem. Perm.	K-8 All Subjects
63-03-11-00	Fischer, Ernest	Sec. Cont.	7-8 All Subjects; 9-12 Science, Biology, Geology-Earth Science
63-04-17-00	Young, James	Sec. Perm.	7-8 All Subjects; 9-12 Math, General Science, Soc. Sci.
63-05-23-00	Shipley, Loren	Elem. Perm.	K-8 All Subjects
63-05-27-00	Goodrich, Sally	Sec. Perm.	7-8 All Subjects; 9-12 Sociology, English; K-12 Phys. Education
63-05-31-00	Skinkle, Russell	Sec. Perm.	7-8 All Subjects; K-12 Music
63-06-03-00	Vince, Kenneth	Sec. Perm.	7-8 All Subjects; K-12 P.S. Music, 9-12 Music Theory, English

63-06-04-00	Carey, Jerry	Sec. Perm.	7-8 All Subjects; 9-12 History, Soc. Sci., Science; K-12 Guid. Counselor
63-06-05-00	Nessing, Diane	Sec. Perm.	7-8 All Subjects; 9-12 Arts & Crafts; K-12 Art
63-06-13-00	Hauer, Zelpha	Sec. Perm.	7-8 All Subjects; 9-12 Science, Soc. Sci., Math, Guidance Coun.
63-06-14-00	Mack, Lawrence	Sec. Perm.	7-8 All Subjects; 9-12 History, Journalism, Soc. Sci.
63-06-17-00	Herendeen, Dwight	Sec. Perm.	7-8 All Subjects; K-12 Ment. Hand.; 9-12 Health, P.E., Soc. Sci., Biol.
63-06-26-00	Pombier, Cyril	Sec. Perm.	7-8 All Subjects; 9-12 Speech, Soc. Sci., Sociology
63-06-26-00	Sierra, Ben	Sec. Perm.	7-8 All Subjects; 9-12 Spanish, Phys. Education, Soc. Science
63-07-02-00	Drake, Patricia	Elem. Perm.	K-8 All Subjects
63-07-08-00	Topping, Laura	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Science, Phys. Science; K-12 Physical Education
63-07-10-00	McCloskey, Dorothy	Sec. Perm.	7-8 All Subjects; 9-12 English, Speech, Latin

63-07-18-00	Gibbs, Dorthy	Sec. Perm.	7-8 All Subjects; 9-12 Speech, Science, Home Economics, Voc. Home Economics
63-07-18-00	Phelan, David	Elem. Perm.	K-8 All Subjects
63-07-22-00	Taylor, William	Sec. Perm.	7-8 All Subjects; K-12 Art; 9-12 History, English
63-07-25-00	Nidelecheff, Marjorie	Sec. Perm.	7-8 All Subjects; 9-12 Home Economics, Foods, English
63-07-29-00	DeOrio, Victor	Sec. Perm.	7-8 All Subjects; 9-12 Biology; K-12 Health, Phys. Educ.
63-07-30-00	Hallawell, Charles	Sec. Perm.	7-8 All Subjects; 9-12 Spanish, Science, Business Education
63-08-04-00(M)	Winfield, Mary	Elem. Perm.	K-8 All Subjects
63-08-29-01	Wilcox, Arnold	Elem. Perm.	K-8 All Subjects; 9-12 Health, Physical Education
63-08-29-02	Wilcox, Charlene	Elem. Perm.	K-8 All Subjects
63-12-18-00	Hansen, Geraldine	Elem. Perm.	K-8 All Subjects
63-12-19-00	Kaupp, Jeannette	Elem. Perm.	K-8 All Subjects
64-03-19-00	Wilson, Maurice	Elem. Perm.	K-8 All Subjects
	<i>retired</i>		
64-03-24-00	Donnelly, Doris	Elem. Perm.	K-8 All Subjects

64-03-31-00	King, Caroline	Elem. Perm.	K-8 All Subjects
64-04-02-00	Minor, James	Elem. Perm.	K-8 All Subjects
64-06-12-00	Ritsema, Virginia	Elem. Perm.	K-8 All Subjects
64-06-13-00	Nordrum, Flossiemæ	Elem. Cont.	K-8 All Subjects; K-12 Ment. Handicapped, Learning Dis.
64-06-13-00	Abbott, Dolores	Elem. Perm.	K-8 All Subjects
64-06-19-00	Mohre, Kay	Sec. Perm.	7-8 All Subj.; K-12 Phys. Ed.; 9-12 History, French
64-07-01-00	Bogart, Daniel	Sec. Perm.	7-8 All Subjects; K-12 Music
64-07-05-00	Cushman, Arwilda	Elem. Perm.	K-8 All Subjects
64-07-10-00	Sargent, Charles	Elem. Perm.	K-8 All Subjects
64-07-14-00	Greene, Byron	Sec. Perm.	7-8 All Subjects; K-12 P.S. Music, 9-12 Music Theory, Applied Music
64-07-16-00	Elder, Donna	Sec. Perm.	7-8 All Subjects; K-12 Health, Phys. Educ.; 9-12 Soc. Science
64-07-21-00	Zimmerman, Richard	Sec. Perm.	7-8 All Subjects; 9-12 English, Social Science
64-07-23-00	Vor. Schmittou, Donna	Sec. Perm.	7-8 All Subjects; 9-12 English Spanish, Social Science
64-09-04-00	Henderson, Violet	Elem. Perm.	K-8 All Subjects; K-12 Guid. Counselor

64-10-14-00	Scholin, Mattie	Elem. Perm.	K-8 All Subjects
64-11-19-00	Rumler, James	Elem. Perm.	K-8 All Subjects
64-11-28-00	Hite, Janice	Elem. Perm.	K-8 All Subjects
64-12-01-00	Hora, Mary Ellen	Elem. Perm.	K-8 All Subjects
65-01-21-00	Bable, Lois	Elem. Perm.	K-8 All Subjects
65-02-02-00	Wetters, Ivan	Elem. Perm.	K-8 All Subjects
65-04-01-00	Zaski, Jon	Elem. Perm.	K-8 All Subjects; 9-12 Soc. Sci., Poli. Sci., Psychology
		Sec. Perm.	7-8 All Subjects; K-12 P.E.; 9-12 Soc. Sci., Health
65-04-20-00	Mueller, Arlene	Elem. Perm.	K-8 All Subjects
65-04-20-00	Mueller, Donald	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts, Gen. Science, Math
65-04-22-00	Schwyn, Thomas	Sec. Perm.	7-8 All Subjects; 9-12 Health and Physical Education
65-04-26-00	Scarpino, Rachel	Elem. Perm.	K-8 All Subjects
65-04-30-00	Bucior, Joyce	Elem. Perm.	K-8 All Subjects
65-05-01-00	Rieger, Gertrude	Elem. Perm.	K-8 All Subjects
65-05-03-00	Stanley, Suzanne	Elem. Perm.	K-8 All Subjects
65-05-12-00	Danilowicz, Dale	Elem. Perm.	K-8 All Subjects

65-05-13-00	Smith, Darwin	Sec. Perm.	7-8 All Subjects; K-12 Ment. Hand.; 9-12 Economics, Bus. Educ., Phys. Educ.
65-06-08-00	Daugherty, James	Sec. Perm.	7-8 All Subjects; 9-12 English
65-06-29-00	Riedel, Mary	Elem. Perm.	K-8 All Subjects; K-12 Guidance Counselor
65-07-10-00	Reed, John	Sec. Perm.	7-8 All Subjects; 9-12 Social Science, Bus. Education
65-07-13-00	Adams, Howard J.	Sec. Perm.	7-8 All Subjects; K-12 P.E.; 9-12 Soc. Sci., Biology, Sci.
65-07-13-00	LaBonte, Doris	Sec. Perm.	7-8 All Subjects; 9-12 English, History, Spanish
65-08-05-00	Clardy, Nora	Sec. Perm.	7-8 All Subjects; 9-12 Math, English
65-08-07-00	Sanders, Muriel	Elem. Perm.	K-8 All Subjects
65-08-24-00	Willoughby, Norma <i>retired 6/81</i>	Sec. Perm.	7-8 All Subjects; 9-12 Voice, English; K-12 Music
65-11-29-00	Walker, Phyllis	Elem. Cont.	K-8 All Subjects; 9-12
		Sec. Perm.	Sci., Speech, English
65-12-04-01	Sears, Larry	Elem. Perm.	K-8 All Subjects; 9 Soc. Sci.; 10-12 Spec.
65-12-04-02	Parker, David	Sec. Perm.	7-8 All Subj.; 9-12 Ind. Arts

66-01-04-00	Perry, Mayra	Elem. Perm. K-8 All Subjects
66-01-16-00	Feldmann, Judith	Sec. Perm. 7-8 All Subjects; 9-12 Soc. Sci., English, Speech, Drama
66-01-27-00	Stratton, Naomi <i>retired</i>	Elem. Perm. K-8 All Subjects
66-02-14-00	Pearse, Lela	Elem. Cont. K-8 All Subjects; 9 Soc. Sci.
66-03-21-00	Minor, Sue	Elem. Perm. K-8 All Subjects
66-03-23-00	VanLonkhuysen, Chris	Sec. Perm. 7-8 All Subjects; 9-12 German, Chemistry
66-04-15-00	Elliott, Todd	Sec. Perm. 7-8 All Subjects; 9-12 Geog.; K-12 Physical Education
66-04-19-00	Garrison, David	Sec. Perm. 7-8 All Subjects; 9-12 History, English, Math
66-04-26-00	Yonker, James	Sec. Perm. 7-8 All Subjects; 9-12 Math, English, Chemistry
66-04-30-00	Smith, Donald	Sec. Perm. 7-8 All Subjects; 9-12 Math, Chemistry, Social Science
66-05-02-00	Blanchard, Dorothy	Elem. Perm. K-8 All Subjects
66-05-06-00	Watkins, Donald	Sec. Perm. 7-8 All Subjects; 9-12 Math, Chemistry, Physics
66-05-06-00	Kratofil, Joseph	Sec. Perm. 7-8 All Subjects; 9-12 Math, Science, German

66-05-12-00	Bear, Norma	Sec. Perm. 7-8 All Subjects; 9-12 Social Science, Phys. Educ., English
66-05-12-00	Ordway, James	Elem. Perm. K-8 All Subjects
66-05-15-00	Soviar, Stephen	Sec. Perm. 7-8 All Subjects; 9-12 Bus. Administration, English
66-05-20-00	Yost, Joyce	Elem. Perm. K-8 All Subjects
66-05-23-00	Marshall, Troy	Elem. Perm. K-8 All Subjects; K-12 Teacher of Emotionally Impaired
66-05-27-00	Sears, Olga	Elem. Perm. K-8 All Subjects
66-06-02-00	Horton, Byron	Elem. Perm. K-8 All Subjects
66-06-03-00	Adams, Howard B.	Sec. Perm. 7-8 All Subjects; 9-12 History, Social Science
66-06-06-00	Hunt, Carol	Elem. Perm. K-8 All Subjects
66-06-09-00	Strunk, Richard	Elem. Perm. K-8 All Subjects
66-06-10-00	Jones, Evan	Sec. Perm. 7-8 All Subjects; K-12 P.E.; 9-12 Health, History
66-06-10-00	Cottrell, Patricia	Elem. Const. K-8 All Subjects; K-12 Orth. Handicapped, Ment. Hand., Teacher of Homebound
66-06-17-00	Janke, Charles	Sec. Perm. 7-8 All Subjects; K-12 P.E.; 9-12 History, Health

66-06-17-00	Donahue, Charles	Sec. Perm.	7-8 All Subjects; 9-12 History, Social Science
66-06-21-00	Garrison, Julie	Elem. Perm.	K-8 All Subjects
66-06-22-00	Olfier, Suzanne	Elem. Perm.	K-8 All Subjects
66-06-23-00	Toll, Henry	Sec Perm.	7-8 All Subjects; 9-12 History, Poli. Sci., Geography
66-07-16-00	Schneider, Peter	Sec. Perm.	7-8 All Subjects; K-12 Ind. Arts; 9-12 Math, Geography
66-07-21-00	Slugay, Myra	Elem. Perm.	K-8 All Subjects
66-08-12-00	Anderson, Linda	Elem. Perm.	K-8 All Subjects
66-08-13-00	Heerspink, Roger	Sec. Perm.	7-8 All Subjects; 9-12 German, English, History
66-08-22-00	Tietjen, Charles	Sec. Perm.	7-8 All Subjects; 9-12 Soc. Sci., Guid. Coun.; K-2 P.E.
66-10-12-00	DeBruler, Yvonne	Sec. Perm.	7-8 All Subjects; K-12 P.E.; 9-12 Health, Speech
66-10-25-00	Henry, Nancie	Elem. Perm.	K-8 All Subjects
67-05-04-00	Arducant, Jeane	Sec. Perm.	7-8 All Subjects; 9-12 History, English
67-05-08-00	Gillett, John	Elem. Perm.	K-8 All Subjects
67-05-16-00	Snyder, Dale	Elem. Perm.	K-8 All Subjects

67-05-24-00	McCormick, Carolyn	Elem. Perm.	K-8 All Subjects
67-05-25-00(M)	Dungy, Cleomae	Sec. Perm.	7-8 All Subjects; 9-12 English, Speech
67-05-25-00	Schaefer, Beverly	Elem. Perm.	K-8 All Subjects
67-06-08-00	Nowlin, Dolores	Elem. Perm.	K-8 All Subjects
67-06-23-00	Maher, Sandra	Elem. Perm.	K-8 All Subjects
67-06-23-00	Conrad, Charles	Sec. Perm.	7-8 All Subjects; 9-12 History, Psychology, Soc. Sci., German
67-06-26-00	Espie, Patricia	Elem. Perm.	K-8 All Subjects; 9-12 Teacher of the Blind
67-06-28-00	Spaan, Mary Ann	Elem. Perm.	K-8 All Subjects; 9-12 Health, Phys. Educ.
67-07-03-00	VanderLee, Bert	Sec. Perm.	7-8 All Subjects; 9-12 Biology, History, Latin
67-07-05-00	Dulworth, Jacqueline	Sec. Cont. Full Voc.	7-8 All Subjects; 9-12 Bus. Ed., Soc. Sci., Dist. Ed., History, English; 9-12 Voc. Dist. Educ., Bus. Ed.; Gen. Off. Cler., Steno & Sec., Typing and Related Occ.
67-07-13-00	Ragain, Charles	Elem. Perm.	K-8 All Subjects
67-07-19-00	Kemp, Lora	Sec. Perm.	7-8 All Subjects; K-12 Art; 9-12 English, Social Science

67-07-20-00	Brown, Edwin	Sec. Perm.	7-8 All Subjects; 9-12 History, Soc. Sci.
67-08-07-00(M)	Bowles, Hazel	Elem. Perm.	K-8 All Subjects
67-08-08-00	Holton, Garry	Sec. Perm.	7-8 All Subjects; 9-12 English, Sociology
67-08-23-00	Karas, Raymond	Sec. Perm.	7-8 All Subjects; 9-12 Latin, Russian, Soc. Sci.
67-09-25-00	Schwemin, Shirlee	Elem. Perm.	K-8 All Subjects
67-10-11-00	Peterson, David	Elem. Cont.	K-8 All Subjects; 9 History, Soc. Sci., Lang. Arts
67-10-12-00	Penive, Donald	Sec. Perm.	7-8 All Subjects; 9-12 Math, Physical Science
67-11-20-00	Dwyer, Kathleen	Elem. Perm.	K-8 All Subjects; 9-12 Teacher Counsellor, Mentally Handicapped
67-12-01-00	O'Neil, Margaret	Elem. Perm.	K-8 All Subjects
68-02-03-00	Gilbert, Edythe	Sec. Cont.	7-8 All Subjects; K-12 Art
68-02-06-00	Hertler, Carlene	Elem. Perm.	K-8 All Subjects
68-03-05-00	Laxson, John	Elem. Perm.	K-8 All Subjects
68-04-01-00	Stahle, David	Sec. Perm. Full Voc. Cert.	7-8 All Subjects; 9-12 Geog., Commerce; Voc. Ed. Bus. Educ., Computing; Data Proc./

68-04-03-00	<i>Retired</i> Bruce, Margaret	Elem. Perm.	K-8 All Subjects; K-12 Music Bus.; Gen. Off. Cler.; Type & Related Occupations
68-04-15-00	Baird, Gary	Sec. Perm.	7-8 All Subjects; 9-12 P.F., Biology
68-04-19-00	Young, Gertrude	Elem. Perm.	K-8 All Subjects
68-04-22-00(M)	Anderson, Patricia	Elem. Perm.	K-8 All Subjects
68-04-26-00	Larson, Richard	Sec. Perm.	7-8 All Subjects; 9-12 History, Math
68-05-09-00	Matteson, Sally	Elem. Perm.	K-8 All Subjects
68-05-25-00	Moore, Donna	Sec. Perm. Voc. Cert.	7-8 All Subj.; 9-12 Home Ec., Science, Language Arts; Consumer and Homemaking
68-05-29-00(M)	Herndon, Charlotte	Sec. Perm.	7-8 All Subjects; 9-12 Health; K-12 Physical Education
68-06-04-00	DeOrio, Mary	Sec. Perm.	7-8 All Subjects; K-12 Art
68-06-10-00	Hauser, H. Martin	Sec. Perm.	7-8 All Subjects; 9-12 History; K-12 Ind. Arts
68-06-12-00(M)	Cerqueira, Frank	Sec. Perm.	7-8 All Subjects; 9-12 Soc. Sci.; K-12 Health, Phys. Educ.
68-06-27-00	Kerwin, Sandra	Elem. Perm.	K-8 All Subjects

68-07-26-00	Shepherd, Barbara	Elem. Cont. Sec. Cont. Voc. Cert.	K-8 All Subjects; K-12 Home Ec.; Voc. Home Econ.; Consumer & Homemaking
68-08-05-00	Spieldenner, Robert	Elem. Perm.	K-8 All Subjects; School Psychologist
68-08-27-00	Richard, Lyle	School	Social Worker
68-09-01-00	Horton, John	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts
68-09-01-00	Spaulding, Ken	Sec. Perm.	7-8 All Subjects; K-12 Music; 9-12 Poli.Sci., Voice
68-09-01-00	Stinnet, LaNelle	Elem. Perm.	K-8 All Subjects
68-09-01-00	Sylvester, Reynold	Sec. Cont.	7-8 All Subjects; 9-12 Soc. Sci., History, Biology; K-12 Ment. Handicapped
68-09-01-00	Wuekert, Esther	Elem. Perm.	K-8 All Subjects
68-09-03-00	Henley, Beverly	Elem. Perm.	K-8 All Subjects
68-09-06-00	Boyle, Elizabeth	Elem. Perm.	K-8 All Subjects
68-09-09-00	Kelly, Lois	Elem. Cont.	K-8 All Subjects
69-09-12-00	Gish, John	Sec. Perm.	7-8 All Subjects; 9-12 History, Economics

68-09-13-01	Musselman, Ann	Sec. Cont.	7-8 All Subjects; 9-12 Physical Science; K-12 Voc. Home Econ.; 7-12 Guidance Counselor
68-09-13-02	Perry, Roger	Sec. Perm.	7-8 All Subjects; 9-12 Science, Math, Biology; K-12 Guid. Coun.
68-09-30-01	Larson, Donald	Sec. Cont. Elem. Cont.	K-8 All Subjects; 9-12 Gen. Sci., Geology, Soc. Sci., Earth Science
68-09-30-02	Snyder, Joyce	Elem. Perm.	K-8 All Subjects
68-10-01-00	Spaan, Arnold	Elem. Cont.	K-8 All Subjects
68-10-07-00	McNulty, Susan	Sec. Perm.	7-8 All Subjects; 9-12 History, Social Science
68-10-18-00	Stutesman, Philip	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Chemistry, Social Science
68-10-26-00	Lawrence, Diane	Elem. Perm.	K-8 All Subjects
68-11-01-00	Brinkle, Judy	Elem. Perm.	K-8 All Subjects
68-11-22-00(M)	Ross, Frances	Elem. Perm.	K-8 All Subjects
68-11-28-00	Winfrey, Annabelle	Elem. Perm.	K-8 All Subjects
68-12-30-00	Marvin, Janet	Elem. Perm.	K-8 All Subjects
69-01-02-00	Heathman, Susan	Sec. Perm.	7-8 All Subjects; 9-12 P.E., Agriculture

69-01-15-00	Stevens, Mark	Sec. Perm.	7-8 All Subjects; 9-12 English, Social Science
69-01-18-00	Yost, Paul	Sec. Perm.	7-8 All Subjects; 9-12 Social Science, English
69-01-26-00	Raut, John	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts; K-12 Phys. Educ.
69-02-25-00	Strzalkowski, Theresa	Elem. Cont.	K-8 All Subjects
69-02-26-00	Burnett, Ray	Sec. Perm.	7-8 All Subjects; 9-12 Music Theory, Soc. Sci.; K-12 Music
69-03-14-00	Foster, Anne	Elem. Cont.	K-8 All Subjects; 9 Psych., English, French, Soc. Sci.
69-03-24-00	Phipps, Lawrence	Elem. Perm.	K-8 All Subjects; K-12 Deaf Ed., Physically Handicapped
69-04-01-00	Markiewicz, Ruth	Elem. Perm.	K-8 All Subjects
69-04-11-00	Bean, Don	Sec. Cont.	7-8 All Subjects; K-12 Health, Rec. & P.E.; 9-12 Science, Language Arts
69-04-13-00	Bender, Norma	Elem. Perm.	K-8 All Subjects; K-12 Deaf Ed.
69-05-12-00	DeLaet, Mary	Elem. Perm.	K-8 All Subjects; K-12 Homebound, Hospitalized, Orth. Handicapped

69-05-15-00	Ragonesi, Anthony	Elem. Perm.	K-8 All Subjects; 9-12 Ment. Handicapped
69-06-03-00	Hall, Alice	Sec. Perm.	7-8 All Subjects; K-12 Art; 9-12 Math, History
69-06-06-00	Barone, William	Sec. Perm.	7-8 All Subjects; K-12 Music
69-06-08-00	Kiesel, David	Sec. Perm.	7-8 All Subjects; 9-12 Psychology, Social Science Political Science
69-06-09-01(M)	Martin, James	Sec. Perm.	7-8 All Subjects; 9-12 History, Geography, Industrial Arts
69-06-09-02	Tonnemacher, Sally	Elem. Perm.	K-8 All Subjects; School Psychologist
69-06-10-00	Bluhm, Leonard	Sec. Perm.	7-8 All Subjects; K-12 Art
69-06-19-00	Verhoeven, Martha	Sec. Perm.	7-8 All Subjects; 9-12 Soc. Sci.; K-12 Guid. Counselor
69-06-25-00	Earle, Martha	Elem. Perm.	K-8 All Subjects
69-07-03-00	Weeks, Robert	Elem. Cont.	K-8 All Subjects
69-07-10-01	Landolfi, Anthony	Sec. Cont.	7-8 All Subjects; 9-12 Soc. Sci., History, Psychology, School Social Worker; K-12 Emot. Dist.
69-07-10-02	Ross, William	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts, Soc. Sci., Safety & Driver Educ.

69-07-16-00	Testa, Norma	Elem. Perm.	K-8 All Subjects; K-12 Guidance Counselor
69-07-23-00	Ikins, Robert	Sec. Cont.	7-8 All Subjects; K-12 P.E.; 9-12 History; 7-12 Guidance Counselor
69-07-26-00	McKeown, Sharon	Elem. Perm.	K-8 All Subjects
69-08-01-00	Peters, Ruth	Sec. Perm.	7-8 All Subjects; K-12 Lib. Sci.; 9-12 Home Ec., English, Science; 9-12 Voc. Home Economics
69-08-04-00	Hinkle, Linda	Elem. Perm.	K-8 All Subjects
69-08-06-00(M)	Thompson, Arme	Elem. Perm.	K-8 All Subjects
69-08-09-00	Robinson, Colette	Sec. Perm.	7-8 All Subjects; 9-12 French, Social Science
69-08-14-00	Bymhold, Mary	Elem. Perm.	K-8 All Subjects
69-08-21-00	Rieman, Jill	Sec. Perm.	7-8 All Subjects; 9-12 History, English, Home Economics
69-08-25-01	Cox, Norma	Elem. Perm.	K-8 All Subjects
69-08-25-02(M)	<i>retired 12/81</i> Kilgore, Herman	Elem. Cont.	K-8 All Subjects; 9-12 Agric. Educ., Science, Biology, Health, Phys. Ed. and Recreation
69-08-26-00	Bodemer, Susanne	Elem. Perm.	K-8 All Subjects

69-08-27-00	Driscoll, David	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Soc. Science, Phys. Education
69-08-29-00	Janke, Paula	Sec. Perm.	7-8 All Subjects; 9-12 English, History
69-08-30-00	Shipley, Patsy	Elem. Perm.	K-8 All Subjects
69-09-02-00(M)	Kilgore, Lonnie	Elem. Cont.	K-8 All Subjects
69-09-29-00	Parker, Linda	Sec. Perm.	7-8 All Subjects; 9-12 English, Social Science
69-10-17-00	Winzeler, Everett	Sec. Perm.	7-8 All Subjects; 9-12 Biology, Soc. Sci.; K-12 Ment. Hand.
69-11-03-00	Village, John	Sec. Perm.	7-8 All Subjects; 9-12 Math, Science
69-11-13-00	Staska, Robert	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts
69-12-04-00	Gerry, Donna	Elem. Perm.	K-8 All Subjects; K-12 Physical Education
69-12-95-00	Liebner, Joan	Sec. Perm.	7-8 All Subjects; 9-12 French, Spanish, Soc. Sci.
69-12-19-00(M)	Murray, Bettie	Elem. Perm.	K-8 All Subjects; K-12 Ment. Handicapped

70-01-13-01	Madison, James	Sec. Cont.	7-8 All Subjects; 9-12 History, Soc. Sci., German; K-12 Guid. Counselor
70-01-13-02	Dodge, Sue	Elem. Perm.	K-8 All Subjects
70-01-14-00	Greep, Suzette	Elem. Perm.	K-8 All Subjects; K-12 Speech Correction
70-02-17-00	Johnson, Blythe	Elem. Perm.	K-8 All Subjects
70-02-26-00	Vogel, Pennie	Elem. Perm.	K-8 All Subjects; K-12 Ment. Handicapped
70-06-05-00	Putnins, Barbara		School Psychologist
70-06-18-00	Egeler, Gloria	Sec. Perm.	7-8 All Subjects; 9-12 Applied Music, Music Theory, English, Speech
70-07-01-00	Bliss, Helen	Elem. Cont.	K-8 All Subjects; K-12 Ment. Hand.; 9 Social Science
70-07-12-00(M)	Jackson, Eugene	Sec. Perm.	7-8 All Subjects; 9-12 Ind. Arts
70-07-18-00(M)	Hutchinson, Carol	Sec. Cont.	7-8 All Subjects; 9-12 English; K-12 Library Science
70-08-12-00	Heiden, Margo	Elem. Cont.	K-8 All Subjects; 9-12 French, Biology

70-08-20-00(M)	Beamon, Bobby	Sec. Cont.	7-8 All Subjects; 9-12 Ind. Arts
70-09-01-00	Mynard, Perry	Sec. Perm.	7-8 All Subjects; 9-12 Speech, English
70-09-04-01	Kopper, Elwood	Sec. Cont.	7-8 All Subjects; K-12 Speech Correction, 9-12 Soc. Sci.
70-09-04-02	Chipman, Pat	Sec. Cont. Voc. Cert.	7-8 All Subjects; 9-12 Home Ec., Soc. Sci.; K-12 Voc. Home Econ.
70-09-09-00	Collins, Thomas	Sec. Perm.	7-8 All Subjects; 9-12 English, History, Speech
70-09-18-01	Danby, Kay	Sec. Perm.	7-8 All Subjects; K-12 Speech Corr.; 9-12 Soc. Sci., Speech
70-09-18-02	Patton, Susan	Elem. Perm.	K-8 All Subjects
70-09-24-00	Kiesel, Sharon	Elem. Perm.	K-8 All Subjects; K-12 Ment. Handicapped
70-11-06-00(M)	Wade, Ernestine	Elem. Perm.	K-8 All Subjects
70-11-19-00	Derry, Suzanne	Elem. Cont.	K-8 All Subjects; K-12 Ment. Hand.; 9 Lang. Arts, Soc. Sci.; K-12 Learning Disabilities
70-11-30-00	Arner, Agnes	Elem. Cont.	K-8 All Subjects; 9 Lang. Arts, Science, Soc. Sci.
70-12-08-00	Venners, Mary S.	Elem. Perm.	K-8 All Subjects

71-01-12-00	Leach, Bonnie	Elem. Perm.	K-8 All Subjects
71-02-15-00	Ranieri, Marilyn	Elem. Perm.	K-8 All Subjects
71-02-24-00	Gillette, Kathleen	Elem. Cont.	K-8 All Subjects; 9 English, Social Science
71-04-16-00	Bowers, Janette	Sec. Perm.	7-8 All Subjects; K-12 Health, P.E. & Recreation
71-04-17-00	Hoffman, Penny	Sec. Perm.	7-8 All Subjects; 9-12 Psych.; K-12 Speech Correction
71-06-07-00	Elder, Amy	Elem. Perm.	K-8 All Subjects
71-06-17-00	Skomedal, Pat	Elem. Cont.	K-8 All Subjects; K-12 Emot. Dist.; K-12 Learn. Disabilities
71-06-24-00	Jackson, Sharon	Elem. Perm.	K-8 All Subjects
71-09-09-00	Moe, Mary	Elem. Cont.	K-8 All Subjects; 9 English, Social Science
71-09-12-00	Garnaat, Marjorie	Elem. Cont.	K-8 All Subjects
71-09-17-00(M)	Sims, Derry	Elem. Cont.	K-8 All Subjects; 9 Social Science, Health, PE & Rec.
71-09-24-00(M)	Reeves, Donnie	Elem. Cont.	K-8 All Subjects; 9 Soc. Sci.
71-09-30-00	Bullen, Valerie	Sec. Perm.	7-8 All Subjects; 9-12 German, History, Political Science
71-10-18-00(M)	Garlington, Jimmy	Elem. Cont.	K-8 All Subjects; 9 Soc. Sci.

71-10-22-00	Sheridan, Andrew	Sec. Cont.	7-8 All Subjects; 9-12 Soc. Sci.; K-12 Phys. Educ.
71-10-25-00(M)	Arvizu, David	Sec. Cont.	7-8 All Subjects; 9-12 Health; K-12 Physical Education
71-11-08-00	Shamka, Sharon	Elem. Cont.	K-8 All Subjects; 9 Soc. Sci., Science, Lang. Arts
71-12-02-00	Miller, Nancy	Elem. Cont.	K-8 All Subjects
71-12-07-01(M)	Davis, Artie	Elem. Cont.	K-8 All Subjects; 9 English; K-12 Emotionally Disturbed
71-12-08-00(M)	Sanders, Mary	Elem. Cont.	K-8 All Subjects; 9 English, Social Science
71-12-24-00(M)	Johnson, Doris	Elem. Cont.	K-8 All Subjects
71-12-31-00(M)	Williams, Sarah	Sec. Cont.	7-8 All Subjects; 9-12 English Health
72-02-08-00(M)	Ellis, Patsy	Voc. Cert. Sec. Prov. 86	Special Needs 7-8 All Subjects; 9-12 Soc. Sci., 9-12 Secretarial Science
72-03-13-00(M)	Sims, Irma	Elem. Cont.	K-8 All Subjects
72-05-24-00	Schlicklin, Julie	Elem. Perm.	K-8 All Subjects; Early Childhood Specialty

72-06-04-00 Holton, Gordon Sec. Cont. 7-8 All Subjects; K-12 P.E.;
9-12 Soc. Sci.; K-12 Guid.
Counselor

72-06-23-00 Furtwangler, Betty Elem. Cont. K-8 All Subjects; 9 Soc. Sci.,
Lang. Arts; K-12 Ment. Hand.,
Learning Disabled

72-06-28-00 Sawicki, Elizabeth Elem. Cont. K-8 All Subjects; K-12 Ment.
Hand.; 9 Eng., Soc. Science

72-07-01-00 Marshall, Gretchen Sec. Perm. 7-8 All Subjects; K-12 Speech
Correction

72-07-26-00 Bullinger, Mary Ellen Elem. Cont. K-8 All Subjects; 9 Fine Arts;
K-12 Emot. Dist., Learning
Disabled

72-07-31-00(M)Reeves, Frances Elem. Cont. K-8 All Subjects; 9 English,
Social Science

72-08-27-00(M)Brantley, Pearlle Elem. Cont. K-8 All Subjects

72-08-29-00(M)Conner, Chlorita Elem. Cont. K-8 All Subjects; 9 P.E.,
Social Science

72-08-30-00 Buseth, Carolee Elem. Cont. K-8 All Subjects; 9 Lang. Arts

72-09-02-00 Wurster, Paul Elem. Cont. K-8 All Subjects; 9-12 History,
Sec. Cont. Geography; K-12 Guid. Coun.

72-09-05-00 Rohde, Carol Elem. Cont. K-8 All Subjects; 9 English,
Social Science

72-09-06-00(M)Malone, Harold Elem. Cont. K-8 All Subjects; 9 Soc. Sci.

72-09-21-00(M)Griffin-Carter,
Lucy Elem. Cont. K-8 All Subjects; 9-12 Soc.
Sec. Cont. Sci.; 7-12 Guidance Counselor

72-11-03-00 Caspar, Joan Elem. Cont. K-8 All Subjects; 9 English,
Science, Soc. Science

72-11-09-00 Brian, Linda Sec. Prov. 81 7-8 All Subjects; 9-12 Soc.
Sci.; K-12 Speech Correction

72-11-22-00(M)Fobbs, Ava Elem. Prov. 81 K-8 All Subjects; 9 Science,
History

72-12-26-00 Cudworth, Judith Elem. Prov. 80 K-8 All Subjects; K-12 Deaf
Educ.; 9 Fine Arts

73-02-12-00(M)Alexander,
Barbara Elem. Cont. K-8 All Subjects; 9 Soc. Sci.,
Health, PE & Recreation

73-02-29-00(M)Kolb, Mary Sec. Cont. 7-8 All Subjects; 9-12 Bus. Ed.,
Social Science

73-03-26-00 Snell, Carolyn Sec. Perm. 7-8 All Subjects; 9-12 Math.,
Spanish

73-03-28-00 Laughrey, Margaret Sec. Cont. 7-8 All Subjects; 9-12 English

73-03-29-00 Venners, Margaret Elem. Cont. K-8 All Subjects; 9 Lang. Arts,
Social Science

73-07-11-00 Formolo, Judy School Social Worker

73-07-19-00	Strohl, Ruth	Sec. Cont.	7-8 All Subjects; K-12 Speech Correction
73-08-17-00	Macechia, Linda	Elem. Cont.	K-8 All Subjects; 9 Recreation; K-12 Emotionally Disturbed, Learning Disabled
73-08-22-00	Olsen, Dennis	Elem. Cont. Sec. Cont.	K-8 All Subjects; 9-12 Math, Chemistry, Biology
73-08-28-01(M)	Clark, Ronald	Sec. Cont.	7-8 All Subjects; 9-12 P.E., Political Science
73-08-28-02	Krenkel, John	Sec. Prov. 82	7-8 All Subjects; 9-12 English, Social Science
73-08-28-03(M)	Hiram, Lambert	Sec. Perm.	7-8 All Subjects; 9-12 Bus. Ed.; K-12 Health, P.E. & Rec.
73-08-28-04	Wygman, Hugh	Sec. Cont.	7-8 All Subjects; 9-12 Science, Biology; K-12 Emot. Dist.
73-08-29-01	Mark, Betsy	Elem. Cont.	K-8 All Subjects; K-12 Ment. Hand., Orth. Hand., Homebound, Emotionally Disturbed
73-08-29-02	Burnette, Ronald	Sec. Cont.	7-8 All Subjects; K-12 Music
73-09-04-01(M)	Kendrick, Samella	Elem. Cont.	K-8 All Subjects; 9 English
73-09-04-02	Hamilton, Kenneth	Voc. Cert.	Construction & Maintenance

73-09-10-00(M)	Hemphill, Barbara	Elem. Cont.	K-8 All Subjects; Early Childhood Specialty
73-09-11-00	Cole, Jeanette	Elem. Cont.	K-8 All Subjects; 9 Fine Arts
73-09-13-00	Weimer, Barbara	Elem. Perm.	K-8 All Subjects
73-09-20-00	Cooper, Sharon	Elem. Prov. 83	K-8 All Subjects; K-12 Music Sec. Cont.
73-09-21-00	Rohatynski, Marcia	Sec. Cont.	7-8 All Subjects; K-12 Art
73-09-28-00	Long, Nanette	Elem. Cont.	K-8 All Subjects; 9 Science
73-10-02-00	Mitchell, David	Sec. Cont.	7-8 All Subjects; 9-12 History, English
73-11-30-00	Village, Mary Ellen	Elem. Perm.	K-8 All Subjects
73-12-07-00(M)	Burton, Robert	Sec. Cont.	7-8 All Subjects; 9-12 P.E., Social Science
74-01-27-00	Foster, Betty	Sec. Perm.	7-8 All Subjects; K-12 Music, Guidance Counselor
74-02-15-00(M)	Beers, Lamora	Elem. Perm.	K-8 All Subjects
74-02-18-00	Fink, Linda	Elem. Prov. 82	All Subjects; 9 English, Social Science
74-02-19-00	Chenault, Lynn	Elem. Perm.	K-8 All Subjects
74-02-21-00	Dawson, Sally	Elem. Cont.	K-8 All Subjects; 9-12 History, Social Science, German

74-02-24-00(M) Cogswell, Geraldine
Elem. Cont. K-8 All Subjects; 9 Soc. Sci.; K-12 Reading

74-04-04-00 Timmer, Wendy
School Social Worker

74-05-14-00(M) Davis, Virginia
Sec. Cont. 7-8 All Subjects; 9-12 Bus. Ed.

74-08-14-00 Kridler, Warren
Sec. Cont. 7-8 All Subjects; 9-12 Science, Vocational Electronics, Math

74-08-21-00 Cochran, Jeanne
Sec. Prov. 83 7-8 All Subjects; 9-12 Speech; K-12 Physical Education

74-08-23-00 VanLonkhuyzen, Lucy
Sec. Cont. 7-8 All Subjects; K-12 Music; 9-12 English

74-08-28-01 Wells, Harry
Sec. Cont. 7-8 All Subjects; 9-12 Poli. Science, Distributive Educ., Voc. Educ. Dist. Educ.

Full Voc. Distributive Education

74-08-28-02 Smoots, Robert
Sec. Cont. 7-8 All Subjects; K-12 Ind. Arts

74-09-03-00 Crecine, Kathleen
Elem. Cont. K-8 All Subjects; K-12 Speech Correction

74-09-05-00 Colleer, Edwin
Voc. Cert. Welding and Cutting

74-09-06-00 Klop, Phyllis
Sec. Prov. 80 7-8 All Subjects; 9-12 Math, Art

74-09-30-00(M) Bostic, Joye
Elem. Cont. K-8 All Subjects; 9 English

74-10-01-00(M) Delph, Teresa
Elem. Cont. K-8 All Subjects; 9 Soc. Sci.

74-10-15-00 Lamm, Susan
Sec. Cont. K-8 All Subjects; 9-12 Health; K-12 Phys. Education

74-12-24-00 Mroz, Carol
Elem. Cont. K-8 All Subjects; K-12 Emot. Disturbed; School Social Worker

75-04-03-00 Keefer, George
Elem. Cont. K-8 All Subjects; 9-12 Psych., Sec. Perm. Social Science

75-07-23-00(M) Bowman, Deborah
Elem. Cont. K-8 All Subjects; 9 Dance; K-12 Ment. Hand.

75-08-11-00 Cunningham, Craig
Sec. Prov. 81 7-8 All Subjects; 9-12 Math, Health, P.E., & Recreation

75-08-12-00 Reid, Linda
Elem. Perm. K-8 All Subjects; 9 Lang. Arts, Soc. Sci.; K-12 Ment. Hand.

75-08-15-00(M) Clay, Margaret
Sec. Perm. 7-8 All Subjects; 9-12 Music, English, Social Science

75-08-29-00 Gibowski, James
Sec. Prov. 81 7-8 All Subjects; 9-12 English, Journalism

75-10-14-00 Drews, Phyllis
Elem. Cont. K-8 All Subjects; K-12 Ment. Hand., Emot. Disturbed

75-12-31-00 Piotrowski, Cheryl
Elem. Prov. 81 K-8 All Subjects; 9 English; K-12 Education of Deaf

76-01-13-00	Brzezinski, Deborah	Elem. Cont.	K-8 All Subjects; 9 Soc. Sci., Phys. Educ.
76-01-18-00	Alam, Geraldine	Sec. Perm.	7-8 All Subjects; 9-12 English, Soc. Sci., Speech
76-06-23-00	Herbert, Edward Jr.	Sec. Cont.	7-8 All Subjects; K-12 P.E.; 9-12 English, Bus. Educ.; Voc. Dist. Ed.; Dist. Education
77-02-23-00	Sheffer, Janine	Full Voc.	
		Elem. Prov.	83 K-8 All Subjects; 9 Fine Arts; K-12 Educ. of Deaf
77-03-14-00	Anderson, Ruth Ann	Elem. Prov.	82 K-8 All Subjects; 9 Soc. Sci.; Early Childhood Specialty
77-06-16-00	Pieronski, Thomas	Elem. Prov.	82 K-8 All Subjects; 9 Social Science, Psychology
77-08-16-00	Deeg, Sheryl	Sec. Prov.	82 7-8 All Subjects; 9-12 English, Social Science
77-08-19-01	Lee, Robin	Elem. Prov.	83 K-8 All Subjects; 9 Health; K-12 Orth. Hand., Teacher of the Homebound
77-08-19-02	Lake, Donna	Elem. Prov.	82 K-8 All Subjects; 9 English, K-12 Education of Deaf
77-08-30-01	Gaffney, Betty	School Social Worker	
77-08-30-02	Brattain, Steven	Sec. Prov.	81 7-8 All Subjects; 9-12 English; K-12 Music

77-08-30-03	Bergstrom, Wendy	Elem. Prov.	82 K-8 All Subjects; K-12 Ment. Handicapped
77-09-01-00	Basel, Bonita	Sec. Prov.	82 7-8 All Subjects; 9-12 Art, Voc. Home Econ.; K-12 Home Temp. Voc. 82 Ec.; Consumers & Home- making
77-09-07-00	Holda, Michelle	Elem. Prov.	81 K-8 All Subjects; 9 Fine Arts, Social Science, Lang. Arts
77-09-08-01	Diebold, Susan	Elem. Perm.	K-8 All Subjects
77-09-08-02	Csage, Florence	Elem. Perm.	K-8 All Subjects
77-09-08-03	Lambick, Laura	Elem. Prov.	83 K-8 All Subjects
77-09-09-01	Mohney, Kathleen	Elem. Perm.	K-8 All Subjects; 9 Math, Art
77-09-09-02	Zaski, Cheryl	Elem. Cont.	K-8 All Subjects; 9 Math
77-09-12-00(M)	Ray, Uanita	Elem. Prov.	81 K-8 All Subjects; 9 Art, Social Science
77-09-20-00	West, John	Voc. Cert.	Painting & Decorating
77-09-24-00(M)	Hirschman, Betty	Elem. Prov.	82 K-8 All Subjects; 9 Fine Arts, Social Science
77-09-26-00(M)	Cason, Doris	Elem. Perm.	K-8 All Subjects
77-10-08-00	Hammersley, Carolyn	Sec. Perm.	7-8 All Subjects; 9-12 English, Speech, K-12 Music

77-11-18-00(M) Morales, Ruby	Elem. Prov. 81 K-8 All Subjects; 9 Soc. Sci.
78-02-06-01 May, Sveri	Elem. Prov. 82 K-8 All Subjects; 9 English; K-12 Ment. Hand.
78-02-06-02 Burnette, Cheryl	Sec. Prov. 82 7-8 All Subjects; 9-12 Soc. Sci.
78-02-20-00(M) Pigott, Willye	Elem. Prov. 81 K-8 All Subjects; 9 Bus. Ed., Soc. Sci.; K-12 Reading
78-02-26-00(M) Robinson, Linda	Elem. Prov. 84 K-8 All Subjects; 9 Soc. Sci.
78-08-19-00 Brown, Philip	Elem. Prov. 85 K-8 All Subjects; 9 Soc. Sci., Fine Arts; School Social Worker
78-08-22-00 Hutchings, Sheryl	Elem. Perm. K-8 All Subjects; K-12 Emotionally Impaired
78-08-30-00 Donley, Barbara	Sec. Cont. 7-8 All Subjects; 9-12 Biology, Library Science
78-09-01-00 Waite, Victoria	Elem. Cont. K-8 All Subjects; 9 Soc. Sci.; K-12 Emotionally Disturbed, Learning Disabled
78-10-05-00(M) Hicks, Annie	Elem. Prov. 83 K-8 All Subjects; 9 English, Soc. Sci.
78-10-11-00 Pressel, Susan	Elem. Cont. K-8 All Subjects; 9 Lang. Arts

78-10-19-00 Rademacher, Lenore	Sec. Cont. 7-8 All Subjects; 9-12 Bus. Ed., Econ., Voc. Bus. Educ., Voc. Distributive Education
	Temp. Voc. 82 Gen. Off. Cler., Steno & Secre., Typing & Related Occup., Clerical & Secretarial Lab.
78-10-23-01 Smith, Karen	Elem. Prov. 81 K-8 All Subjects; 9 English, Health
78-10-23-02(M) Wade, Gwendolyn	Elem. Prov. 83 K-8 All Subjects; 9 Fine Arts
78-10-25-00 Wygant, Wendy	Elem. Prov. 81 K-8 All Subjects; 9 Soc. Sci.; K-12 Art
78-10-29-00 Arndt, Beverly	Elem. Prov. 81 K-8 All Subjects; K-12 Speech Correction
78-12-11-01(M) Williams, Marilyn	Elem. Prov. 83 K-8 All Subjects; 9 Lang. Arts
78-12-11-02(M) Blakely, O. Pearl	Elem. Prov. 84 K-8 All Subjects; 9 Lang. Arts, Phys. Educ.
79-01-11-00 Moulton, Cynthia	Elem. Prov. 83 K-8 All Subjects; 9 Soc. Sci.; K-12 Ment. Hand.; Early Childhood Specialty
79-02-16-00(M) Cousin, Yvonne	Elem. Prov. 84 K-8 All Subjects; 9 Speech; K-12 Ment. Handicapped
79-06-14-00 Stobie, Thomas	Elem. Cont. K-8 All Subjects; 9 Speech; K-12 Ment. Hand.

79-07-18-00(M)	Muniz, Albert	Sec. Cont.	7-8 All Subjects; 9-12 Spanish, English
79-08-18-00(M)	Davis, Kathy	Sec. Prov. 83	7-8 All Subjects; 9-12 Speech, English
79-08-21-00	Johnson, Rashell	Sec. Prov. 85	7-8 All Subjects; 9-12 Psych., Home Econ., Voc. Home Econ.
79-08-28-00	Tomsovic, Sharon	Elem. Prov. 85	K-8 All Subjects; K-12 Learning Disabled, Emotionally Impaired, Mentally Hand.
79-08-30-0	Strohl, Jay	Elem. Cont.	K-8 All Subjects; 9-12 English; K-12 Music
79-08-31-01	Gibbs, Stanley	Sec. Prov. 84	7-8 All Subjects; 9-12 Biology, Phys. Educ., Psychology
79-08-31-02	Shoaff, Robert	Sec. Prov. 84	7-8 All Subjects; 9-12 Chemistry; K-12 Phys. Education
79-08-31-03(M)	Brown, Larry	Sec. Prov. 84	7-8 All Subjects; 9-12 Biology; K-12 Phys. Education
79-08-31-04	Snyder, Claudia	Elem. Prov. 83	K-8 All Subjects; 9 Soc. Sci., Spanish
79-09-03-00	Cox, Sandra	Elem. Prov. 85	K-8 All Subjects; K-12 Learning Disabled, Emotionally Disturbed, Mentally Handicapped

79-09-04-01	Wilson, Douglas	Elem. Prov. 84	K-8 All Subjects; K-12 Phys. Impaired
79-09-04-02	Rasmussen, Julie	Sec. Prov. 85	7-8 All Subjects; 9-12 Voc. Home Ec.; K-12 Home Econ.
79-09-06-00	Gamin, James	Sec. Prov. 83	7-8 All Subjects; 9-12 Psych.; K-12 Phys. Educ.
80-01-14-00	Alger, Joseph	Sec. Prov. 84	7-8 All Subjects; 9-12 History, K-12 Physical Education
80-01-28-00	Harper, Sharon	Elem. Perm.	K-8 All Subjects
80-02-29-00(M)	Gates, Austin	Sec. Prov. 81	7-8 All Subjects; 9-12 Science, Soc. Sci.; K-12 Phys. Educ.
80-04-04-00	Korth, Charlene	Sec. Perm.	7-8 All Subjects; 9-12 Home Econ., Soc. Sci.; K-12 Mentally Handicapped
80-05-06-00	Winzeler, Barbara	Elem. Prov. 83	K-8 All Subjects; 9 Soc. Sci.
80-08-07-00	Moore, Paula	Elem. Cont.	K-8 All Subjects; K-12 Speech Corr., Educ. of Deaf
80-08-27-00	Rios, Lyn	Sec. Prov. 84	7-8 All Subjects; K-12 Music
80-09-08-00	Ratchford, Thomas	Sec. Prov. 86	7-8 All Subjects; 9-12 Math, Business Administration
80-09-10-00	Beson, Kevin	Sec. Prov. 86	7-8 All Subjects; K-12 Music

80-10-03-00	McDonald, Mary Ellen	Sec. Prov. 85 7-8 All Subjects; 9-12 Dist. Temp. Voc. 85 Educ., Recreation; Voc. Dist. Education
80-11-14-00	McCluskey, Beverly	Sec. Perm. 7-8 All Subjects; 9-12 Bus. Educ., English, Economics; 7-12 Guidance Counselor
81-01-05-01	Fenech, Marilyn	Elem. Prov. 85 K-8 All Subjects; 9 Soc. Sci.; Early Childhood Specialty
81-01-05-02(M) Lim, Donna		Elem. Prov. 86 K-8 All Subjects; 9 Science
81-02-17-00(M) Pitts, Shirley		Sec. Perm. 7-8 All Subjects; 9-12 English, Latin, Social Science

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Civil Action File No. 81-60156

WENDY WAGANT, et al.,

Plaintiffs,

vs.

JACKSON BOARD OF EDUCATION, et al.,

Defendants.

AFFIDAVIT RE INTERPRETATION
RE SENIORITY LIST

(Filed June 14, 1982)

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Thomas Rasmusson, being first duly sworn, deposes
and says that:

The Seniority List of the Jackson School District
teachers heretofore furnished the Court sets forth the
year-of-hire in the first two digits appearing before each
teacher's name.

Further, deponent says not.

/s/ Thomas Rasmusson (P19242)
Co-Counsel for Plaintiffs
501 S. Capitol Avenue, #305
Lansing, MI 48933

STATE OF MICHIGAN)
) ss.
 COUNTY OF INGHAM)

On this 10 day of June, 1982, personally appeared before me, a Notary Public, in and for said county and state, the above-named, Thomas Rasmusson, who acknowledged that he has read the foregoing by him subscribed, and knows the contents thereof, and that the same is true of his own knowledge except those matters therein stated on information and belief, and as to those matters he believes them to be true.

/s/ Shirley Ann Womack, Notary Public,
 Clinton County, MI, acting in
 Ingham County, MI
 My Commission Expires: 10-17-83

JACKSON PUBLIC SCHOOLS

<u>Year</u>	<u>Minority Students</u>	<u>Total Student Population</u>	<u>Minority Percentage</u>
1973-74	2,292	12,531	18.3
1974-75	2,314	12,142	19.1
1975-76	2,338	11,792	19.8
1976-77	2,296	11,126	20.6
1977-78	2,283	10,576	21.6
1978-79	2,493	9,998	24.9
1979-80	2,509	9,717	25.8
1980-81	2,422	9,163	26.4
1981-82	2,286	8,724	26.2
1982-83	2,292	8,321	27.5

JACKSON PUBLIC SCHOOLS

Ethnic Count Students

Year	American Indian	Black	Asian	Hispanic	Vietnamese	White	Total
1970-71	7	2,016	19	157	0	11,393	13,586
1971-72	11	1,956	28	162	0	11,368	13,525
1972-73	8	2,066	32	166	0	10,796	13,068
1973-74	18	2,070	39	165	0	10,239	12,531
1974-75	21	2,091	34	168	0	9,828	12,142
1975-76	56	2,052	43	185	2	9,454	11,792
1976-77	27	2,044	42	175	8	8,830	11,126
1977-78	19	2,031	59	174	0	8,293	10,576
1978-79	268	1,976	79	170	0	7,496	9,998
1979-80	282	1,934	74	219	0	7,208	9,717
1980-81	256	1,852	112	203	0	6,740	9,163
1981-82	138	1,834	110	204	0	6,438	8,724
1982-83	144	1,862	96	190	0	6,029	8,321

December 17, 1982

M E M O R A N D U M

TO: William Pearson
 FROM: Bruce Ambs
 SUBJECT: Minority Staffing for Coaching Positions

Attached are listings of minority staff in coaching positions in Jackson Public Schools in 1981-82 and 1982-83.

Because some individuals are in more than one coaching assignment, the percentage figures below reflect minority staff in coaching positions by three different measures.

I. Percentage of minority staff in coaching assignments.

1981-82	1982-83
19.4%	31.3%

II. Percentage of coaching positions filled by minority staff.

1981-82	1982-83
18.3%	29.3%

III. Percentage of supplementary salaries for coaching paid to minority staff.

1981-82	1982-83
19.0%	29.7%

Three coaching positions for 1982-83 at Parkside Junior High are not yet filled.

The percentage of student population who are minority is 27.5 for 1982-83.

BJA/jp

JACKSON PUBLIC SCHOOLS
 1400 W. Monroe Street
 Jackson, Michigan 49202
 Phone 517-789-8144

4/6/83

Teacher Aides

<u>Year</u>	<u>Total Teacher Aides</u>	<u>Minority Teacher Aides</u>	<u>Minority Percent</u>
1973-74	112	17	15.1
1974-75	105	20	19.0
1975-76	109	21	19.2
1976-77	46	7	15.2
1977-78	64	12	18.7
1978-79	63	13	20.6
1979-80	79	24	30.4
1980-81	53	15	28.3
1981-82	53	16	30.1
1982-83	54	16	29.6
4/6/83			

Administrators

<u>Year</u>	<u>Total Administrators</u>	<u>Minority Administrators</u>	<u>Minority Percent</u>
1973-74	63	7	11.1
1974-75	55	8	14.9
1975-76	56	10	17.9
1976-77	49	7	14.3
1977-78	49	10	20.4
1978-79	52	10	19.2
1979-80	50	9	18.0
1980-81	48	8	16.7
1981-82	46	9	19.6
1982-83	41	10	24.4
4/6/83			

Teachers

<u>Year</u>	<u>Minority Percent</u>	<u>American Indian</u>	<u>Black</u>	<u>Asian</u>	<u>Spanish</u>	<u>White</u>
1973-74	11.2	2	62	0	0	511
1974-75	11.4	2	62	1	0	506
1975-76	10.8	1	59	1	0	506
1976-77	10.3	2	51	1	1	469
1977-78	10.9	2	55	1	1	481
1978-79	12.3	2	59	1	1	450
1979-80	12.9	4	56	1	5	444
1980-81	13.4	4	55	2	4	421
1981-82	13.5	4	50	1	5	386
1982-83	13.9	4	48	0	4	348